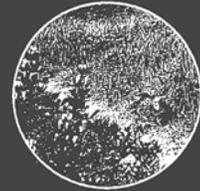




Final Environmental Impact Report
White Point Park Nature Preserve

State Clearinghouse Number 2001041074



Submitted to:
Los Angeles Department of
Recreation and Parks

Submitted by:
 Jones & Stokes

September 2001

**White Point Park Nature Preserve
Final Environmental Impact Report**

Prepared for:

Los Angeles Department of Recreation and Parks
200 N. Main Street
Room 709, City Hall East
Los Angeles, CA 90012
Contact: Paul Davis

Prepared by:

Jones & Stokes
17310 Red Hill Avenue, Suite 320
Irvine, CA 92614
Contact: Chad R. Beckstrom
949/260-1080

September 2001

Jones & Stokes. 2001. White Point Park Nature Preserve Final Environmental Impact Report. September. (J&S 01150.) Irvine, CA. Prepared for Los Angeles Department of Recreation and Parks, Los Angeles, CA.

Final EIR Contents

Section 1. Introduction

Section 2. Response to Comments

Section 3. Errata to the Draft Environmental Impact Report

Section 4. Mitigation Monitoring Plan

Section 1 Introduction

Purpose

The Los Angeles Department of Recreation and Parks (Department), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Final Environmental Impact Report (Final EIR) for the proposed White Point Park Nature Preserve project (SCH# 2001041074). This Final EIR contains all of the required contents as outlined in Section 15132 of the State CEQA Guidelines, including

- the Draft Environmental Impact Report (Draft EIR) or a revision to the draft;
- comments and recommendations received on the Draft EIR;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- any other information added by the Lead Agency.

This Final EIR for the project consists of Comments and Responses to Comments, an Errata to the Draft EIR, and a Mitigation Monitoring Plan for the project. This Final EIR is intended to be used along with the Draft EIR, which is incorporated by reference and bound separately.

A Draft EIR was prepared for the project and circulated for public review from June 28, 2001, through August 13, 2001. Comments were received during the public review period. Copies of these letters are provided in Section 2, "Comments Received and Responses to Comments" of this Final EIR.

The Department may also adopt Findings of Fact and a Statement of Overriding Considerations if its deliberations concerning the project result in approval of the project as proposed in the Draft EIR.

This Final EIR assembles all the environmental data and analyses that have been prepared for the proposed project, including public and agency comments on the Draft EIR and responses by the Department to those comments. Technical appendices are available for public review at the Department offices, located at 200 N. Main Street, 7th Floor, Room 709, City Hall East, Los Angeles. The intent of the Final EIR is to provide a forum to air and address comments pertaining to the analysis contained in the Draft EIR and to provide an opportunity for clarification, corrections, or minor revisions to the Draft EIR as needed.

The evaluation and response to comments is an important part of the CEQA process because it allows the following:

- the opportunity to review and comment on the methods of analysis contained in the Draft EIR;
- the ability to detect any omissions that may have occurred during the preparation of the Draft EIR;
- the ability to check for accuracy of the analysis contained within the Draft EIR;
- the ability to share expertise; and
- the ability to discover public concerns.

Process

The Draft EIR was distributed to various public agencies, organizations, and individuals on June 28, 2001, for a 45-day public review period through the Governor's Office of Planning and Research, State Clearinghouse, and the City of Los Angeles. The review period ended on August 13, 2001. The Department used several methods to elicit comments on the Draft EIR. The Notice of Availability (NOA) was mailed to various agencies and organizations and to individuals that had previously requested such notice. Additionally, the NOA was published in the Los Angeles Times and Torrance Breeze newspapers and was posted at the Los Angeles County Clerk-Recorder's office. The Draft EIR was available for review at the Department office in City Hall East and at the San Pedro Regional Library.

Pursuant to Section 15088 of the State CEQA Guidelines, the Department, as the Lead Agency for the project, has reviewed all comments received on the Draft EIR. Responses to these comments are contained within Section 2, "Comments Received and Responses to Comments," of this Final EIR. Any revisions to the Draft EIR based on these comments have been presented in Section 3, "Errata to the Draft EIR," of this Final EIR in revision mode text (i.e., deletions are shown with ~~strikethrough~~ and additions are shown with double underline).

Section 2

Response to Comments

Section 2

Comments Received and Responses to Comments

Introduction

In accordance with Section 15088 of the State CEQA Guidelines, the Department has evaluated the comments received on the Draft EIR for the White Point Park Nature Preserve project and has prepared written responses to these comments. This section provides copies of the comments received during the public review process and provides an evaluation and written responses for each of these comments.

Comments Received

Prior to the close of the public review period for the project, the Department received 46 comment letters from state, regional, and local government agencies; interest groups and private organizations; and individuals. The commenting parties are listed below. Each of the commenting parties is labeled with a letter, which corresponds to the comment letters and the responses to comments provided herein.

State Government Agencies

- A. State of California Governor's Office of Planning and Research, State Clearinghouse
- B. State of California Governor's Office of Planning and Research, State Clearinghouse
- C. State of California Office of Historic Preservation, Department of Parks and Recreation
- D. State of California Department of Transportation

- E. Department of Toxic Substances Control
- F. Department of Toxic Substances Control

Regional/Local Government Agencies

- G. Southern California Association of Governments
- H. City of Los Angeles, Cultural Affairs Commission
- I. City of Los Angeles, Department of Transportation
- J. City of Los Angeles, Environmental Affairs Department

Interest Groups/Organizations

- K. American Youth Soccer Organization
- L. California Native Plant Society, South Coast Chapter
- M. Fort MacArthur Museum Association
- N. Friends of White Point
- O. Los Angeles Nike Air Defense Veteran's Association
- P. Los Angeles Conservancy
- Q. Palisades Residents Association of San Pedro
- R. Palos Verdes Peninsula Land Conservancy
- S. San Pedro and Peninsula Homeowner's Coalition
- T. South Shores Homeowners' Association
- U. White Point Nature Preserve Steering Committee

Individuals

- V. James and Veralee Bassler
- W. Deborah and Blaine Beron-Rawdon
- X. Bruce Biesman-Simons, Biesman-Simons Architecture
- Y. Susan J. Brakel
- Z. Bill Cain
- AA. Douglas Epperhart
- BB. Carol Gray
- CC. Milton W. Heyne
- DD. Barry W. Holchin

EE. Saudol Holwerde
FF. Ronald A. Marinkovich
GG. John G. Miller, M.D. FACEP
HH. Theresa J. Miller
II. Elsa L. Morris
JJ. Rodger D. Paige
KK. Noel Park
LL. Russel and Christina Parkison
MM. Beth Sohngen
NN. Sally F. Strehlke
OO. Lawrence D. Vivian PE, MBA
PP. Dennis Weyrauch
QQ. Gayle Williamson
RR. Karen Winter

Comments and Responses to Comments

This section includes responses to all written comments on the Draft EIR received by the Department in accordance with Section 15088 of the CEQA Guidelines. The responses focus on environmental issues that were raised in the comments. Where applicable, revisions to the Draft EIR associated with the responses to comments are provided in Section 3, "Errata to the Draft EIR," of this Final EIR.

This section is formatted so that the respective comment letters are followed immediately by the corresponding responses.



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse



Steve Nissen
DIRECTOR

August 14, 2001

David Attaway
Los Angeles City Department of Recreation and Parks
200 North Main Street
Room 709
Los Angeles, CA 90012

Subject: White Point Nature Preserve
SCH#: 2001041074

Dear David Attaway:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 13, 2001, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

A-1

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

A-2

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

A-3

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2001041074
Project Title White Point Nature Preserve
Lead Agency Los Angeles City Department of Recreation and Parks

Type EIR Draft EIR
Description Establishment of a nature preserve at White Point Park to provide for passive recreation and educational opportunities, as well as protection of the sensitive biological species. The project includes land use improvements and establishments and restoration of native habitat. The planned land use improvements promote sustainability and integrity of the natural areas while providing for a mix of compatible passive recreation uses.

Lead Agency Contact

Name David Attaway
Agency Los Angeles City Department of Recreation and Parks
Phone 213/485-6178 **Fax**
emall
Address 200 North Main Street
Room 709
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets Western Avenue (SR-213)/Paseo Del Mar
Parcel No.
Township 5S **Range** 14W **Section** **Base** SB

Proximity to:

Highways SR-213/SR-110
Airports
Railways
Waterways Pacific Ocean/Catalina Channel/Los Angeles Harbor
Schools South Shores/Whites Point/Lasuen/Leland
Land Use Vacant with former Batter Paul D. Bunker and Nike Missile Program facilities. Currently, no public access.
OS - 1XL
Open Space

Project Issues Coastal Zone; Recreation/Parks; Toxic/Hazardous; Traffic/Circulation; Vegetation; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Archaeologic-Historic

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 5; Department of Fish and Game, Marine Region; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 06/28/2001 **Start of Review** 06/28/2001 **End of Review** 08/13/2001

Note: Blanks in data fields result from insufficient information provided by lead agency.



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse



Steve Nissen
DIRECTOR

August 16, 2001

David Attaway
Los Angeles City Department of Recreation and Parks
200 North Main Street
Room 709
Los Angeles, CA 90012

Subject: White Point Nature Preserve
SCH#: 2001041074

Dear David Attaway:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on August 13, 2001. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

A-4

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2001041074) when contacting this office.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

- A-1 For the purpose of the administrative record, this statement acknowledges the close of the public review period of August 13, 2001. No response is required
- A-2 This statement cites Section 21104(c.) of the California Public Resources Code (CEQA Statutes) as a reminder that comments shall be substantive and within an area of expertise of the respective public agency. No response is required.
- A-3 For the purpose of the administrative record, this statement acknowledges that the Los Angeles Department of Recreation and Parks has complied with the State Clearinghouse review requirements for draft environmental documents. No response is required.
- A-4 The Department acknowledges that the responses to late comments are not required under CEQA. However, late comments are addressed herein.



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse



Steve Nissen
DIRECTOR

ACKNOWLEDGEMENT OF RECEIPT

DATE: July 3, 2001
TO: David Attaway
Los Angeles City Department of Recreation and Parks
200 North Main Street
Room 709
Los Angeles, CA 90012
RE: White Point Nature Preserve
SCH#: 2001041074

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: June 28, 2001
Review End Date: August 13, 2001

B-1

We have distributed your document to the following agencies and departments:

California Coastal Commission
California Highway Patrol
Caltrans, District 7
Department of Conservation
Department of Fish and Game, Marine Region
Department of Fish and Game, Region 5
Department of Parks and Recreation
Department of Toxic Substances Control
Department of Water Resources
Native American Heritage Commission
Office of Historic Preservation
Regional Water Quality Control Board, Region 4
Resources Agency
State Lands Commission

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.

- B-1 For the purpose of the administrative record, this statement acknowledges the receipt of the Draft document for the review period; start date of June 28, 2001, and an end date of August 13, 2001; and the distribution to State agencies. No response is required.

AUG-10-2001 FRI 09:00 AM OHP

FAX NO. 916 653 9824

P. 02

STATE OF CALIFORNIA - THE RESOURCES AGENCY

GRAY DAVIS, Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942996
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov



RECEIVED
AUG 10 2001
STATE CLEARINGHOUSE

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8/13/01
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August 10, 2001

David Attaway, Environmental Supervisor
City of Los Angeles Department of Recreation and Parks
200 N Main St, Rm 709
City Hall East
Los Angeles CA 90012

Dear Mr. Attaway:

White Point Park Nature Preserve Draft Environmental Impact Report
(SCH#2001041074)

Thank you for the opportunity to comment on the above-referenced document. The State Office of Historic Preservation (OHP) has broad responsibility for the implementation of federal and state historic preservation programs in California. The OHP is interested in this project because it may impact resources listed on the California Register of Historical Resources.

The OHP concurs with findings made in the Draft Environmental Impact Report (DEIR) related to significance of historical and archeological resources on the project site and significance of impacts to these resources that could result from implementation of the proposed project. For this reason, our comments herein will for the most part be related to mitigation measures and alternatives proposed in the DEIR.

C-1

In relation to archeological resources on the project site, we recommend implementation of Mitigation Measures A-1, A-2, and A-3, as they appear to be feasible and will serve to lessen impacts to archeological resources below a level of significance. In addition, we strongly suggest Mitigation Measure A-2 include a provision for having a professionally qualified archeologist on-site during all ground-disturbing activities. Contractors are not professionally trained to identify archeological remains and therefore may not realize that a site is being impacted by their actions. Therefore an archeologist serving as a monitor will guarantee previously unknown archeological sites will not be inadvertently impacted by excavation and grading activities.

C-2

C-3

The OHP also supports implementation of Mitigation Measures A-4 and A-5, which serve to lessen impacts, albeit not below a level of significance, to historical resources on the project site. Although it is not specifically stated in the DEIR, we trust that Mitigation Measure A-4 will contain some level of narrative and photographic documentation of the historical resources on the project site, so if the project is implemented as proposed, future researchers will have a source of information for those resources that would be demolished. We commend the City for inclusion of Mitigation Measure A-5 in the DEIR, as a maintenance plan for historical resources on the project site is greatly needed.

C-4

C-5

C-6

Page 2
Mr. David Attaway

We of course support serious consideration of Alternatives 2 and 3, with preference being given to Alternative 3. Both of these alternatives meet the vast majority of project objectives and appear to be feasible. There is no evidence presented in the DEIR that would suggest either of these alternatives is infeasible. In relation to financial feasibility, we also suggest that you consider applying for a grant from the California Heritage Fund, which will be making \$8.5 million available for properties listed on the California Register of Historical Resources. The grants, which are competitive, will be administered by our office and will be distributed in two cycles, the first application period being this fall. Information about the grant program, as well as additional grant programs being coordinated by our parent department, the California Department of Parks and Recreation, can be found on our website at www.ohp.parks.ca.gov.

C-7

C-8

C-9

In light of the fact that there appears to be feasible alternatives to the proposed project that will have less of an impact on the environment, the OHP recommends the project not be approved as proposed. The California Legislature has codified its intent to make the primary point of the EIR process development of feasible alternatives and mitigations to avoid significant environmental effects, and public agencies should apply the analysis gleaned from the EIR process and "should not approve a project" if feasible alternatives and mitigations are not first adopted. (PRC, Section 21002) Additionally, Section 21002.1 of the Public Resources Code provides in mandatory language that agencies "shall mitigate or avoid the significant effects on the environment of projects . . . whenever it is feasible to do so."

C-10

C-11

CEQA commentators agree that in light of the above mandates CEQA is not just a procedural statute, but contains a "substantive mandate" that agencies must adopt feasible alternatives that can substantially lessen or avoid adverse effects on the environment. (Remy, Thomas, Moose, and Manley, *Guide to the California Environmental Quality Act (CEQA)*, Solano Press Books, (10th ed. 1999), pages 2-3, citing PRC, Section 21001; CCR, Sections 15002(a)(3), 15021(a)(2), 15041(a), 15063(c)(2), 15091(a), 15093, 15096(g), 15126(c) and (d), 15364, 15370, and *Sierra Club v. State Board of Forestry* (1994) 7 Cal.4th 1215, 1233.) The CEB publication, *Practice Under the California Environmental Quality Act* concedes CEQA has "limited, but important, substantive provisions. The primary substantive requirement is that agencies must avoid or reduce environmental harm by adopting feasible project alternatives or mitigation measures." (Kostka and Zischke, *Practice under the California Environmental Quality Act*, CEB, Vol. 1, Section 1.19, page 16)

C-12

C-13

Additionally, the California Supreme Court agrees with the finding that CEQA has critical substantive requirements. For example, in *Mountain Lion Foundation v. Fish & Game Commission* (1997) 16 Cal.4th 105, the State Supreme Court found "a public agency must . . . consider measures that might mitigate a project's adverse environmental impact, and adopt them if feasible." (*Id.* at 124) The Court further reiterated "CEQA's substantive mandate that public agencies refrain from approving projects for which there are feasible alternatives or mitigation measures." (*Id.* at 134) As further supported in *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3rd 30, 41, "CEQA contains substantive provisions with which agencies must comply. The most important . . . is the provision requiring agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures

C-14

C-15

C-16

Page 3
Mr. David Attaway

can substantially lessen such effects." Although these and most other CEQA cases deal with natural resources, their findings do apply to historical resources as well.

C-16

Because we are aware that lead agencies often assess the practicalities of alternatives by evaluating how they relate to project objectives, we must point out what we see as an inconsistency in the objectives identified in the DEIR. It is our opinion that the objective of removing "existing vandalized structures that contribute to aesthetic and safety concerns of the surrounding community" is in direct conflict with the objective to "maintain the major contributing features of the site that present the site's significance in military air defense since World War II." (DEIR, page ES-3) Those structures that remain on site should be considered as being among the "major contributing features of the site." Without the service buildings that now remain in the district, the public is given an incomplete and inaccurate picture of our nation's military air defense system during the NIKE era. With just the launch facility and underground storage magazines remaining, visitors will not be provided an opportunity to experience and understand the large amount of maintenance and security required by our nation's air defenses in this era. Therefore, the service and security structures and buildings that still remain are integral to the public's thorough comprehension of this important component of state and national history.

C-17

We also must point out that while the issues of history and aesthetics often do go hand in hand, they may also at times be in conflict. Industrial and military buildings may for the most part not be the most aesthetically pleasing structures, but that consideration should not be given precedence over their historical significance. If the structures that are now on site were adequately maintained and secured, they would, like the vast majority of historical resources, not present a threat either to the aesthetics or security of the surrounding neighborhood, but rather would serve as an asset, helping to convey the significance of the entire White Point area in the history of coastal defense in California. A significance in which residents of the White Point area should take pride.

C-18

Thank you for the opportunity to comment on the DEIR prepared for this project. Please understand our comments herein are specifically related to the environmental review process and adequacy of documents prepared for environmental review purposes. We do not take positions in support of or against projects subject only to local land use planning decisions, but rather focus on the environmental review process itself. Please feel free to contact Jenan Saunders, Local Government CEQA Coordinator, at (916) 653-9432 or jsaun@ohp.parks.ca.gov with any questions.

Sincerely,



Dr. Knox Mellon
State Historic Preservation Officer

- C-1 The City acknowledges that OHP concurs with the findings related to significance of historical and archaeological resources at the project site and the significance of impacts that could result from implementation of the proposed project. No further response is required.
- C-2 The City intends to implement Mitigation Measures A-1, A-2 and A-3 as part of the proposed project in order to reduce potential archaeological resources. No further response is required.
- C-3 Given the extensive study of the site during the preparation of the Draft EIR and prior to this time, the potential archaeological and historical resources are well documented. Mitigation Measure A-1 provides adequate mitigation measures to avoid known resources. Because ground-disturbing activities (such as grading for the parking lot) are limited across the site and are not proposed near archaeological sites, the potential to disturb unknown archaeological deposits is low. Therefore, Mitigation Measure A-2 is considered adequate to reduce any residual impacts.
- C-4 The City intends to implement Mitigation Measures A-4 and A-5 as part of the proposed project, and acknowledges that impacts would remain significant. No further response is required.
- C-5 Mitigation Measure A-4 would contain both narrative and photographic documentation of the historical resources. These provisions have been added to the Mitigation Measure A-4. It should be noted that significant documentation exists as part of the nomination package that was submitted to the OHP prior to listing the district on the California Register of Historic Resources.
- C-6 The City intends to implement Mitigation Measure A-5 as part of the proposed project, as the City recognizes the historical values of the resources that would be retained as part of the proposed project. No further response is required.
- C-7 This comment expresses the opinion of the commenter to consider the adoption of Alternatives 2 and 3, with preference given to Alternative 3, instead of the proposed project. This comment will be forwarded to the decision makers to consider during the deliberations on the proposed project. No comments regarding the adequacy of the EIR are presented. No additional response is required at this time.
- C-8 The City acknowledges that there is no evidence presented within the EIR to suggest that the alternatives are infeasible. However, the findings of feasibility do not need to be presented in the Draft EIR, but rather within the Findings of Fact as part of the certification process in the Final EIR phase. Section 15021(b) of the CEQA Guidelines provides that "In deciding whether changes in a project are feasible, an agency may consider specific economic, environmental, legal, social, and technological factors." These alternatives have not yet been determined to be either feasible or infeasible at this time.

- C-9 The City will consider the grant from the California Heritage Fund in determining the appropriate course of action for the historic resources on the project site.
- C-10 This comment expresses the opinion of the commenter to disapprove the project as proposed in light of the fact that feasible alternatives exist. This comment will be forwarded to the decision makers to consider during the deliberations on the proposed project. As discussed above, these alternatives have not yet been determined to be either feasible or infeasible at this time.
- C-11 The City acknowledges that the Legislature has declared the “policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects...” (Public Resources Code (PRC) 21002). The City further acknowledges that Section 21002.1(b) of the PRC provides that agencies “shall mitigate or avoid the significant effects on the environment of projects...whenever it is feasible to do so.” However, the OHP fails to acknowledge item (c) of same Section 21002.1, which provides that, “If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project the project may nonetheless be carried out or approved at the discretion of a public agency...” Furthermore, in accordance with section 21081, a public agency may find that “specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.”
- C-12 The City acknowledges that CEQA contains both substantive requirements as well as procedural requirements. The City has complied with all procedural requirements, and the DEIR includes all substantive requirements pursuant to the CEQA Guidelines. No specific comments regarding the adequacy of the EIR are presented in this comment. No additional response is required at this time.
- C-13 The City acknowledges that avoiding or reducing environmental harm through implementing mitigation measures or adopting feasible alternatives is one of the substantive requirements of CEQA. Several mitigation measures are incorporated into the project in order to reduce, minimize or altogether avoid significant environmental impacts. With respect to impacts on historical resources, the impacts were determined to be significant and unavoidable, even with implementation of mitigation measures. The alternatives identified and evaluated within the EIR will be considered by the decision makers during the deliberations on the project. However, as discussed above, these alternatives have not yet been determined to be either feasible or infeasible at this time.
- C-14 As discussed above, mitigation measures have been identified and will be implemented as part of the project. However, the alternatives have not yet been determined to be either feasible or infeasible at this time.
- C-15 As discussed above, mitigation measures have been identified and will be implemented as part of the project. However, the alternatives have not yet been determined to be either feasible or infeasible at this time.

- C-16 As discussed above, mitigation measures have been identified and will be implemented as part of the project. However, the alternatives have not yet been determined to be either feasible or infeasible at this time. If the alternatives are considered to be feasible during the Findings of Fact, then the City would consider adopting one of the alternatives and deny the proposed project.
- C-17 This comment expresses the opinion of the commenter that the objectives of the project seem to conflict with one another. The objective to “maintain the major contributing features of the site that present the site’s significance in military air defense since World War II” is intended to refer to the preservation of the Battery Paul D. Bunker, and the Nike Missile Launch Pad and Underground Storage Magazines. As presented in the DEIR, these are the most central and evocative components of the Historic District, which will evoke historic relationships of the buildings and structures of the entire facility as well as the relationship to the larger Fort MacArthur installation and the Los Angeles Harbor Defense network. The presence of the remaining Nike Launch pad facility and the Battery Paul D. Bunker would convey the important role that the Nike facility played in the transition between WWII air defense and Cold War-Era missile defense programs. While the DEIR recognizes that the demolition of the other structures would be a significant impact, these structures are not recognized as major contributors to the District. Additionally, the objective to remove “existing vandalized structures that contribute to aesthetic and safety concerns of the surrounding community” is intended to respond to the objectives of the “proposed project” and the community’s concerns regarding these facilities.
- C-18 The City recognizes that historical resources are not always aesthetically pleasing. The removal of these significant historical resources has been identified as a significant impact that cannot be mitigated. The commenter is expressing an opinion regarding the reduced threat to aesthetics and security of the surrounding neighborhood. There is no evidence provided to suggest that aesthetics and security would be enhanced, and the commenter should be reminded of Section 21104(c.) of the California Public Resources Code, which emphasizes that comments shall be substantive and supported with specific documentation.

DEPARTMENT OF TRANSPORTATION
OFFICE OF REGIONAL PLANNING
DISTRICT 7, IGR/CEQA 1-10C
120 SO. SPRING ST.
LOS ANGELES, CA 90012
TEL: (213) 897-6696 ATSS: 8- 647-6696
FAX: (213) 897-6317



July 31, 2001

IGR/CEQA cs/010747
DEIR
City of Los Angeles
White Point Park
Western Ave./25th St.
Vic. LA-213-00
SCH # 2001041074

Mr. Paul Davis
City of Los Angeles
City Hall East
Department of Recreation and Parks
200 N. Main St., Room 700
Los Angeles, CA 90012

Dear Mr. Davis:

Thank you for including the California Department of Transportation in the environmental review process for the above-mentioned project. Based on the information received, we have the following comments:

Any work to be performed within the State Right-of-way will need an Encroachment Permit from the California Department of Transportation.

D-1

We recommend that construction related truck trips on State highways be limited to off-peak commute periods. Transport of oversize or overweight vehicles on State highways will need a Transportation Permit from the California Department of Transportation.

D-2

If you have any questions regarding our response, refer to our internal IGR/CEQA Record # cs/010747, and please do not hesitate to contact me at (213) 897-4429.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Buswell".

STEPHEN BUSWELL
IGR/CEQA Program Manager

cc: Mr. Scott Morgan, State Clearinghouse

- D-1 The Department acknowledges that an Encroachment Permit would be required from the California Department of Transportation if any work is performed within the State right of way. Caltrans has been added to the list of responsible agencies in Chapter 1, and compliance with the Encroachment Permit has been added to the discussion in Chapter 3D.
- D-2 The Department acknowledges the recommendation to limit construction related trips on State Highways to off-peak commute periods, and that oversized or overweight vehicles on State Highways requires a Transportation Permit from the California Department of Transportation. This information has been added to the discussion in Chapter 3D.



Winston H. Hickox
 Agency Secretary
 California Environmental
 Protection Agency

Department of Toxic Substances Control

Edwin F. Lowry, Director
 1011 N. Grandview Avenue
 Glendale, California 91201



Gray Davis
 Governor

July 27, 2001

Mr. David Attaway, Environmental Supervisor
 City of Los Angeles Department of Recreation and Parks
 200 N. Main Street, Room 709, City Hall East
 Los Angeles, CA 90012

RE:DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WHITE POINT NATURE
 PRESERVE, SCH No. 2001041074

Dear Mr. Attaway:

The Department of Toxic Substances Control (DTSC) has received a Draft
 Environmental Impact Report (EIR) for the above mentioned Project.

Based on the review of the document, the DTSC comments are as follows:

- | | |
|--|-----|
| 1) The Draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area. | E-1 |
| 2) The Draft EIR needs to identify any known or potentially contaminated site within the proposed Project area. For all identified sites, the Draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment. | E-2 |
| 3) The Draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight. | E-3 |
| 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate Health and Safety procedures should be implemented. If it is determined that contaminated soil exists, the Draft EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide appropriate regulatory oversight. | E-4 |

Mr. Attaway
July 27, 2001
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). Also, DTSC is administering the \$85 million Urban Cleanup Loan Program (UCLP), which provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. The program is composed of two main components: low interest loans of up to \$100,000 to conduct preliminary endangerment assessments of underutilized properties; and loans of up to \$2.5 million for the cleanup or removal of hazardous materials also at underutilized urban properties. These loans are available to developers, businesses, schools, and local governments.

E-5

For additional information on the VCP or UCLP please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further please contact Arman Moheban, Project Manager, at (818) 551-2834 or me at (818) 551-2877.

Sincerely,



Harlan R. Jeché
Unit Chief
Southern California Cleanup Operations - Glendale Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

- E-1 Chapter 3C, "Hazards and Hazardous Materials," of the Draft EIR provides an extensive review of the previous investigations performed onsite and adequately describes the existing conditions. As stated within the Draft EIR, the historic uses of the property did result in the release of some hazardous substances, which were subsequently remediated and closed by the DTSC. It was determined that the site would not pose a health or safety risk to human health and the environment.
- E-2 Chapter 3C, Hazards and Hazardous Materials, of the Draft EIR provides an extensive review of the previous investigations performed onsite and adequately describes the existing conditions. As stated within the Draft EIR, the site contains two areas that were of concern with respect to hazardous materials – the burn pit and the construction debris area. These areas were thoroughly investigated, remediated and closed by the DTSC. It was determined that the site would not pose a risk to human health and the environment.
- E-3 Chapter 3C, Hazards and Hazardous Materials, of the Draft EIR provides an extensive review of the previous investigations performed onsite. Prior remediation activities were performed onsite and the site was subsequently closed by the DTSC after it was determined that the site would not pose a health or safety risk to occupants onsite. The Regional Water Quality Control Board has not issued a "No Further Action" closure on the site, and negotiations are currently under way with the RWQCB as the regulatory oversight agency. The Draft EIR provides this discussion and includes mitigation to that effect, which requires approval by the RWQCB prior to development onsite.
- E-4 Construction activities onsite would be completed in accordance with all applicable local, state and federal regulations. Halting construction if soil contamination is suspected is standard practice and will be adhered to if the contractor suspects potential hazardous conditions. In the event that soil contamination exists, appropriate health and safety procedures would be enacted and any additional investigation and remediation would occur prior to commencing construction. The Regional Water Quality Control Board and the City of Los Angeles Local Enforcement Agency would oversee any further action onsite.
- E-5 Thank you for the information regarding guidance for the PEA preparation and cleanup oversight. These resources will be considered in the event that additional investigation or cleanup is required.



Winston H. Hickox
 Agency Secretary
 California Environmental
 Protection Agency

Department of Toxic Substances Control

Edwin F. Lowry, Director
 1001 "I" Street, 25th Floor
 P.O. Box 806
 Sacramento, California 95812-0806



Gray Davis
 Governor

July 3, 2001

David Attaway
 City of Los Angeles Department of Recreation and Parks
 200 North Main Street, Room 709, City Hall East
 Los Angeles, California 90012

Re: White Point Nature Preserve

The Department of Toxic Substances Control (DTSC) is in receipt of the environmental document identified above. Based on a preliminary review of this document, we have determined that additional review by our regional office will be required to fully assess any potential hazardous waste related impacts from the proposed project. The regional office and contact person listed below will be responsible for the review of this document in DTSC's role as a Responsible Agency under the California Environmental Quality Act (CEQA) and for providing any necessary comments to your office:

F-1

Sayareh Amirebrahimi
 Site Mitigation Branch
 1011 North Grandview Avenue
 Glendale, California 91201

If you have any questions concerning DTSC's involvement in the review of this environmental document, please contact the regional office contact person identified above.

Sincerely,

Guenther W. Moskat, Chief
 Planning and Environmental Analysis Section

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

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- F-1 A copy of the Draft EIR was provided to the DTSC's regional office in Glendale. A separate comment letter was received from that office (Harland Jeche), and responses to that letter are provided in this Final EIR. It should be noted that the DTSC has issued a "No Further Action" letter for remediation and clean up efforts initiated by the Los Angeles Air Force (LAAFB). Any further closure investigations and reports would be under the oversight of the Regional Water Quality Control Board.

SOUTHERN CALIFORNIA



ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street
12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

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Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

July 27, 2001

Mr. David Attaway
Environmental Supervisor
City of Los Angeles
Department of Recreation and Parks
Planning and Construction
200 N. Main Street, Room 709
Los Angeles, CA 90012

RE: **Comments on the Draft Environmental Impact Report for the White Point Park Nature Preserve Master Plan - SCAG No. I 20010373**

Dear Mr. Attaway:

Thank you for submitting the **Draft Environmental Impact Report for the White Point Park Nature Preserve Master Plan** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

It is recognized that the proposed Project considers the implementation of a master plan for the development of a nature preserve at White Point Park to provide recreation and educational opportunities, as well as, protection of sensitive biological species. The project also includes land use improvements and establishment and restoration of native habitat.

SCAG staff has evaluated the Draft EIR for consistency with the Regional Comprehensive Plan and Guide and Regional Transportation Plan. The Draft EIR, in Section 3E (Land Use) includes a discussion on the proposed Projects' consistency with SCAG policies and applicable regional plans, which were outlined in our May 1, 2001 letter on the Notice of Preparation (NOP) for this Draft EIR.

The Draft EIR cited SCAG policies and addressed the manner in which the proposed Project is consistent with applicable core policies and supportive of applicable ancillary policies. Table 3E-6 (Consistency of the White Point Park Nature Preserve Project with the SCAG Regional Comprehensive Plan and Guide) incorporated a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the applicable policies with the proposed Project. This approach to discussing consistency or support of SCAG policies is commendable and we appreciate your efforts. Based on the information provided in the Draft EIR, we have no further comments. A description of the proposed Project was published in the July 15, 2001 Intergovernmental Review Report for public review and comment.

If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Planner
Intergovernmental Review

G-1

G-2

- G-1 Thank you for your comments regarding the adequate treatment of SCAG policies and applicable regional plans in the Draft EIR. These were analyzed as requested by SCAG in the comment letter provided during the Notice of Preparation. No issues regarding the adequacy of the EIR are provided.
- G-2 Thank you for the commendation on the efforts of the Draft EIR to cite and evaluate SCAG policies according to the manner requested. No issues regarding the adequacy of the EIR are provided.

CITY OF LOS ANGELES
CALIFORNIA



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(213) 473-7700
(213) 473-8352 FAX

MARGIE J. REESE
GENERAL MANAGER

July 6, 2001

Mr. David Attaway, Environmental Supervisor
200 No. Main St., Room 709
Los Angeles, CA 90012

RE: WHITE POINT PARK NATURE PRESERVE MASTER PLAN –
NOTICE OF COMPLETION AND AVAILABILITY OF A
DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Mr. Attaway:

Thank you for the opportunity to comment on the above-referenced document. The Cultural Heritage Commission is concerned that the Korean Bell and the Battery Osgood-Farley, both Historic-Cultural Monuments, would be unaffected by the project. If there is any proposed change to those, the alterations must conform to the Secretary of the Interior's Standards for Rehabilitation.

H-1

Very truly yours,


Jay Oren, Architect

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- H-1 No changes are proposed to the Korean Bell and the Battery Osgood-Farley, both resources of which are located at Angel's Gate Park. These resources would in fact be unaffected by the project at White Point Park.

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

Paseo Del Mar bet. Western Ave.
& Weymouth Ave.

Date: August 14, 2001

To: Mr. David Attaway, Environmental Supervisor
Department of Recreation and Parks

From: *Robert T. Takasaki*
Robert T. Takasaki, Senior Transportation Engineer
Department of Transportation

Subject: **DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE PROPOSED WHITE POINT PARK NATURE PRESERVE ON THE NORTH SIDE OF PASEO DEL MAR BETWEEN WESTERN AVENUE AND WEYMOUTH AVENUE**

The Department of Transportation (DOT) has reviewed the DEIR and supporting traffic study prepared by traffic consultant, Linscott, Law & Greenspan for the proposed White Point Park Nature Preserve in San Pedro. White Point Park consists of 102 acres that is bounded by Western Avenue on the west, Weymouth Avenue on the east, the Los Angeles Air Force Base housing on the north, and Paseo Del Mar on the south. The traffic study determined that the project would not have a significant traffic impact to Paseo Del Mar or the surrounding area. Except as noted, the study adequately evaluates the project's traffic impacts.

| 1-1

PROJECT DESCRIPTION

The proposed project consists of the implementation of a Nature Preserve Master Plan at White Point Park to provide for passive recreation and education opportunities, and protection of sensitive biological species by removing non-native grassland and vegetation and replacing them with plant diversity that is more representative of local habitat. The proposed project further consists of installation of visitors' services and facilities, such as, restrooms and drinking water fountains; removal of certain structures and buildings that formed the Nike Missile Program; construction of pedestrian entry points and trail system and removal or abandonment of some of the existing trails and roadways; closure of two existing driveways; and construction of a new parking lot with 66 parking spaces including additional parking areas for buses and bicycles. Access to the parking lot will be provided from separate one-way entry and exit driveways on Paseo Del Mar. The DEIR estimated that the project will serve between 20,000 to 30,000 visitors annually with 15,000 to 30,000 people attending educational and recreational events. The DEIR also states that the project will be completed in the Year 3003 and will be open from dawn to dusk.

In addition to the proposed project, the DEIR also analyzed five different project alternatives as follows:

David Attaway

- 2 -

August 13, 2001

- **Alternative 1. No Project Alternative**

This Alternative consists of maintaining the status quo with the Park closed to the public. This Alternative was eliminated because it would not meet the objective to restoring native habitat and preventing further deterioration of the White Point Park properties.

- **Alternative 2:**

This Alternative consists of essentially the same elements as the proposed project with the exception that all the structures which form the Nike Missile Program will be maintained without any of the proposed upgrades or restoration. The DEIR states that under this alternative, public access to these structures may be restricted to prevent further vandalism and deterioration.

- **Alternative 3:**

This Alternative consists of essentially the same elements as the proposed project with the exception that the Warhead Building, Missile Warhead Nike Hercules Assembly and Service Building, Ready Room, and the three Sentry Buildings will be upgraded and preserved. The rest of the structures in the Nike Missile Site will be removed.

- **Alternative 4:**

This Alternative consists of the removal of all the above-ground structures that formed the Nike Missile Program, but would not include the development of the proposed Preserve. However, all the underground structures including the Nike Missile Lunch Facility, underground magazines and the Battery Paul D. Bunker will remain. The site will be preserved for future development of a park. The DEIR states that this alternative will remedy the existing vandalism and deterioration of the Nike Missile above-ground structures.

- **Alternative 5:**

This Alternative consists of essentially the same elements as the proposed project with the addition of a sports athletic field. This Alternative was eliminated because it is not consistent with the proposed project objective and would not reduce any of the significant impact associated with the proposed project.

TRAFFIC ANALYSIS

The traffic study indicates that the proposed project will generate approximately 466 daily weekday trips with 27 trips during the weekday peak hour, and 576 daily weekend trips with 35 trips during the weekend peak hour. DOT concurs with the DEIR that the proposed project will not result in any

David Attaway

- 3 -

August 13, 2001

significant traffic impact on Paseo Del Mar or the surrounding area

I-2

HIGHWAY DEDICATION AND STREET WIDENING REQUIREMENTS

Paseo Del Mar is designated as a Secondary Scenic Highway which requires a 70-foot roadway on a 90-foot right-of-way. This portion of Paseo Del Mar is presently improved to a variable 40 to 55-foot roadway on a variable 70 to 80 foot right-of-way with no curb and gutter along the north side of the street. The street is generally striped for one lane of traffic and a bike lane in each direction with westbound left turn lane at Western Avenue and at Kay Froientino Street. Western Avenue is designated as a Major Scenic Highway which requires a 80-foot roadway on a 104-foot right-of-way. Western Avenue is presently improved to a 55-foot roadway on a 90-foot right-of-way with no curb and gutter along the east side of the street. DOT recommends that the north side of Paseo Del Mar and east side of Western Avenue adjacent to the project frontage be improved with curb and gutter and widened satisfactorily to DOT and Bureau of Engineering (BOE) to provide a minimum 13.5-foot traffic lane and 7-foot bike lane.

I-3

CONSTRUCTION MANAGEMENT PLAN

The DEIR indicates that during construction it may be necessary to temporarily close portions of the westbound lane on Paseo Del Mar. DOT recommends that a Traffic Construction Management Plan be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or lane closures, traffic detours, haul routes, hours of operation, flagmen, protective devices, warning signs, and maintaining local access and existing bike lane on Pasco Del Mar.

I-4

PARKING ANALYSIS

The DEIR indicates that the proposed project will provide a parking lot with 66 parking spaces including an area for 3 buses to park and unload adjacent to the visitor staging area. Access to the parking lot will be from Paseo Del Mar through a main entry gate. The parking area will be open to the public without fee during regular park hours. After hours, the main gate will be closed. The parking lot will be served by a one-way-entry driveway and one-way exit driveway. The project also includes the possibility of providing 33 additional parking spaces for future expansion of the parking lot.

DRIVEWAY ACCESS

The review of this study does not constitute approval of the driveway access and circulation scheme. Those require separate review and approval and should be coordinated as soon as possible with DOT's Citywide Planning Coordination Section (201 N. Figueroa St., 3rd Floor, Station 23) to avoid

I-5

David Attaway

- 4 -

August 13, 2001

delays in the building permit approval process. The proposed one-way driveway may be 20 feet wide to accommodate buses and emergency vehicles.

15

If you should have any questions, please contact Jimmy Ewenike of my staff at (213) 580-5207.

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c: Council District No. 15
Southern District, DOT
Design Division, DOT
Bikeway Section, DOT
Citywide Planning Coordination Section, DOT
Land Development Group, BOE
Hagar Plafkin, Department of City Planning
Linscott, Law & Greenspan

- I-1 Thank you for your comments on the adequacy of the traffic study. The areas of concern are addressed separately below.
- I-2 The Department acknowledges LADOT's concurrence with the findings that the proposed project would not result in any significant traffic impacts on Paseo Del Mar or the surrounding area.
- I-3 The Department acknowledges LADOT's recommendation that the north side of Paseo Del Mar and the east side of Western Avenue adjacent to the project site be improved with curb and gutter and widened satisfactorily to LADOT and Bureau of Engineering to provide a minimum 13.5-foot traffic lane and 7-foot bike lane. However, it should be noted that this comment does not address the adequacy of the CEQA document, but is rather a design issue. In fact, the proposed project does not result in any impacts, and the street segment along Paseo del Mar currently operates, and is projected to operate at Level of Service A. Additionally, the project is largely open pervious land, and the proposed parking lot would also be constructed with pervious materials. Therefore, there is no nexus to require widening of Paseo del Mar or installation of curb and gutter features. The Department will however coordinate with LADOT during the final design phases for the project. No further response is required.
- I-4 The Department acknowledges that a Traffic Construction Management Plan be submitted to DOT for review and approval prior to the start of any construction work. The Draft EIR contains a mitigation measure (Mitigation Measure D-2), which includes these provisions. The plan will show the location of any roadway or lane closures, traffic detours, haul routes, hours of operation, flagmen, protective devices, warning signs and maintenance of local access and bike lane on Paseo Del Mar.
- I-5 The Department acknowledges that the review of the study does not constitute approval of the driveway access and circulation scheme, and understands that a separate review and approval must be coordinated with LADOT's Citywide Planning Coordination Section. This will be accomplished prior to development of the project.

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: August 9, 2001

To: Mr. David Attaway
Environmental Supervisor
Recreation and Parks Department

From: Joe Maturino
Environmental Supervisor II
Environmental Affairs Department, MS 248

Subject: Draft EIR, White Point Park Nature Preserve

The Environmental Affairs Department, Local Enforcement Agency has reviewed the draft EIR for the White Point Park Nature Preserve and provides these comments.

1. The site was a previous landfill and must therefore comply with the closure post-closure requirements for landfills per Title 27, CCR, Section 21190. A post closure plan will need to be developed and submitted to our agency for review and approval. Our agency needs to be added to the list of agencies and regulations noted on section 3C.3 and 3C4.2 J-1
2. Any future development will require review and approvals by our agency, the Local Enforcement Agency. Therefore, plans for any structures need to be submitted to our agency for review prior to construction. J-2
3. Any construction near or on the burn pit and construction debris area may require a soil liner to mitigate any potential landfill gas intrusion into any proposed structures. Therefore construction of any structures should be identified and their locations noted in the EIR. J-3
4. Monitoring for the presence of landfill gas needs to be included in the areas of the burn pit and construction debris area. J-4
5. The regulatory status of the two landfills need to be better clarified. J-5

Should you have any questions, please contact me at 213-978-0865.

- J-1 The Department acknowledges that the project must comply with the closure and post-closure requirements for landfills per Title 27, CCR, Section 21190. As requested, the City of Los Angeles Environmental Affairs Department, as the Local Enforcement Agency (LEA), has been added to the list of responsible agencies on Page 1-5 of the Draft EIR, and Title 27, CCR, Section 21190 has been added to the list of regulations noted in Chapter 3C, "Hazards and Hazardous Materials" of the EIR. However, it should be noted that the "landfills" do not contain municipal waste and have undergone extensive testing to determine that they do not pose a significant risk to human health and the environment.
- J-2 The Department acknowledges that future development onsite would require review and approval by the City of Los Angeles Local Enforcement Agency (LEA). Plans for the project would be submitted to the LEA for review prior to development of the project. However, it should be noted that nonhabitable structures are proposed at this time. The project is proposed as a nature preserve with passive open space and educational opportunities.
- J-3 As indicated in Chapter 2, "Project Description" of the EIR, no structures are proposed near the burn pit or construction debris area. It should also be noted that the landfills do not contain municipal waste and have undergone extensive testing to determine that they do not pose a significant risk to human health and the environment.
- J-4 Monitoring for the presence of landfill gas does not need to be included near the burn pit or construction debris area. As discussed above, these areas do not contain municipal waste and have undergone extensive testing to determine that they do not pose a significant risk to human health and the environment.
- J-5 The landfills have received closure from the DTSC. The Regional Water Quality Control Board still considers the site an "active" case. The Department and the LAAFB are currently working with the RWQCB to determine the appropriate course of action in order to resolve the "landfill" issues. Mitigation Measure C-1 has been included within the Draft EIR to emphasize the importance of this effort.



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August 12, 2001

Mr. David Attaway
City of Los Angeles
Department of Recreation and Parks
200 N. Main Street, Room 709 CHE
Los Angeles, CA 90012

Dear Mr. Attaway:

Subject: **Comments on the White Point Park Environmental Impact Report**

I am providing the following comments on the Draft Environmental Impact Report for the White Point Park Nature Preserve Master Plan.

1. **Project Background.** During the scoping process, I requested that there be a discussion of how we arrived at the project that is the subject of this EIR. Since that discussion has not been provided, specifically as it relates to the record of the White's Point Advisory Committee, I have provided some of that information for the record (Attachment A). This information was previously provided to the Department of Recreation and Parks during one of their Board Meetings and to the Council Office. Due to its' voluminous nature, I have not included the over 1500 letters of support for the development of soccer fields at the Whites Point property that were part of this package. An example of the importance of this background is the removal by the White Point Advisory Committee of "sport fields" from the past plan for the area. The reasoning provided is that this area is now provided for at the Joan Milke Flores Park, a location which due to its slope could not support significant active sport recreation. | K-1
2. **State Clearinghouse.** I could not find a State Clearinghouse Number on the document. I assume the document was submitted to the State for their distribution. | K-2
3. **Alternative Sites.** There is no Alternative Site analysis provided. Is it possible that active youth recreation would be better located at White's Point and that an ecological reserve should be placed at the Gaffey Street landfill site? During the deliberations of the White Point Advisory Committee, AYSO was requested to do an area-wide site selection study (see Attachment A). If Alternative Sites had been examined for all proposed uses at this site, there might be some meaningful discussion of regional land use issues. | K-3



4. Elimination of Alternative 5 from the Environmental Analysis. During the scoping process we requested that an active recreation alternative be included in the CEQA assessment. This analysis is not included and the reasons for eliminating active recreation from consideration are inadequate. K-4
- (a) *"Citizen's Advisory Committee unanimously recommended that the entire site be dedicated as a coastal nature preserve and specifically not include active recreation facilities"*. Actually, this is not correct, there were two or three advisory committee members who did not agree with this determination. Further, it is not clear exactly what legal standing the Advisory Committee has to make such a decision. Who selected this group, on what basis were they selected, do they represent the community or a more narrow geographic area. In particular, the biased geographic locality of the addresses of representatives on this committee (Exhibit 1) says it all. Two groups who attended virtually all Advisory Meetings (AYSO, dog park reps) have constituents that far out number participation in any of the homeowners groups, so it is difficult to understand why a mixed use alternative was not considered. In light of the strong Council support for the recent City Charter amendments, I recommend that the EIR be held until a Neighborhood Council is established that can provide the necessary input into the appropriate use of this valuable community asset. K-4a
- (b) *"This alternative would not be consistent with the project objectives identified above and in Chapter 2."* The project objectives have been narrowly defined to ensure that no other uses/Alternatives can exist at this locality. Specifically, the EIR states *"Prohibit uses, such as active recreation fields, that would conflict with the nature preserve and have the potential to adversely affect sensitive natural resources."* This is an arbitrary constraint put on the project by nine people on the White Point Advisory Committee, representing the South Shores, Palisades, and Pt. Fermin Homeowners Associations to ensure that their neighborhoods remain as quiet and isolated as possible (see Exhibit 1). K-4b
- (c) *"It should be noted that the City has offered to develop an alternative site for AYSO, and has begun planning the 'Field of Dreams' at the former Gaffey Street landfill, a few miles north of the project site."* While we are excited that work has actually begun on construction of soccer fields at the Field of Dreams site, there is no guarantee that AYSO will be able to use these fields, or that the facilities will meet the needs of our youth. AYSO has now been in discussions with Recreation and Parks for well over a year, and while significant progress has been made, there still is no agreement that would allow AYSO use of the fields. With changing City administrations, this is a major concern to us. The statement that AYSO is taken care of elsewhere is only a rationalization for elimination of this Alternative 5. This is only meaningful if in fact there had been thoughtful, broad community input into what is the best use of White's Point – the make-up of the Advisory Committee does not warrant such a conclusion. K-4c
- (d) *"This alternative fails to reduce significant impacts associated with the proposed project."* Since use of the site for recreational needs has been eliminated from the environmental analysis, there is no basis for this statement. The plan proposed by K-4d

AYSO did not call for any removal or disturbance of historic structures. In fact, AYSO felt the structures should be rehabilitated and serve the uses at the site (meeting room, bathroom, interpretive, etc.). In regard to the other environmental issues mentioned as being negatively affected (biology, transportation, etc.) we will never know for sure since there was no analysis. The overall effect of placement of soccer fields/open space on 12 acres of the 120 acre site might still result in ecological benefits while allowing for active recreation at the site. We do know that soccer fields are present off Forestall Ave. in Rancho Palos Verdes, which are adjacent to existing Coastal Scrub habitat. This always seemed like an educational/interpretive opportunity for the youth using the facility rather than a constraint. Unfortunately because the Advisory Committee conveniently decided that there would be no mixed use at the site such combined uses have not been considered.

K-4d
cont'd

5. Project Implementation Prior to Discretionary Actions. Since the purpose of this EIR is in part to make a decision on what project is to be implemented at the project site, and to serve as a legal basis for future discretionary actions by the City and other agencies, it is not clear how the City/Department has proceeded to date in some of its decision making. For instance, how is it possible that improvements have occurred at the site, including demolition of existing structures, planting of native vegetation, importing of rock, cleaning of the site, and erection of a sign announcing this as a future site of an ecological reserve, when the environmental document has not even been completed? Has a coastal permit been issued for such activities?

K-5

6. Intended Uses. It was my understanding that the Land use for the White's Point parcel under consideration was previously designated as a "white hole" for planning purposes and would require modification of the City's Community/General Plan prior to any specific use. It is also my understanding that the White Point property falls under the dual jurisdiction of the City and the Coastal Commission because there is no adopted/certified Local Coastal Plan for this area. If true, this would require Coastal Permits from both agencies prior to any activities at the site.

K-6

7. Issues to be Resolved and Areas of Controversy. It is perplexing to understand why there is no mention of other uses/alternatives that were the proposed for this area as at least areas of controversy. Specifically, the designation of this entire area as an ecological reserve is controversial and still an issue to be resolved.

K-7

8. Environmental Justice. One of the more important considerations for the use of this parcel that cannot be tested because of the narrow treatment of alternatives is the proposition that this project is unfair to lower income families that live on the "east side" of the hill. Because of the decisions of the Whites Point Advisory Committee, which is perpetuated in this document, recreation by our children has been relegated to an industrial portion of San Pedro. An excellent review of Environmental Justice issues written by Gregory King was recently published in the Summer 2001 Issue of the Environmental Monitor and should be considered here.

K-8

I had hoped that this document would provide a fair and objective treatment of issues associated with White's Point, and that there would be some consideration of other alternatives proposed for this area so that some regional/community scope could be introduced into the planning process. The process did not even provide for an open public scoping meeting on the issues following release of the Notice of Preparation. What we are left with is a deficient document that perpetuates the objectives of a few local residents for what should be a broad community decision. **Because of the importance of this parcel as the last major undeveloped location in San Pedro, the document should be put on the shelf until local Neighborhood Council(s) are formed and a more balanced view of what is to transpire at this location is evaluated, including a meaningful evaluation of additional/mixed use alternatives.** Short of this, the document should be revised and recirculated following a well publicized public meeting.

K-9

Sincerely,

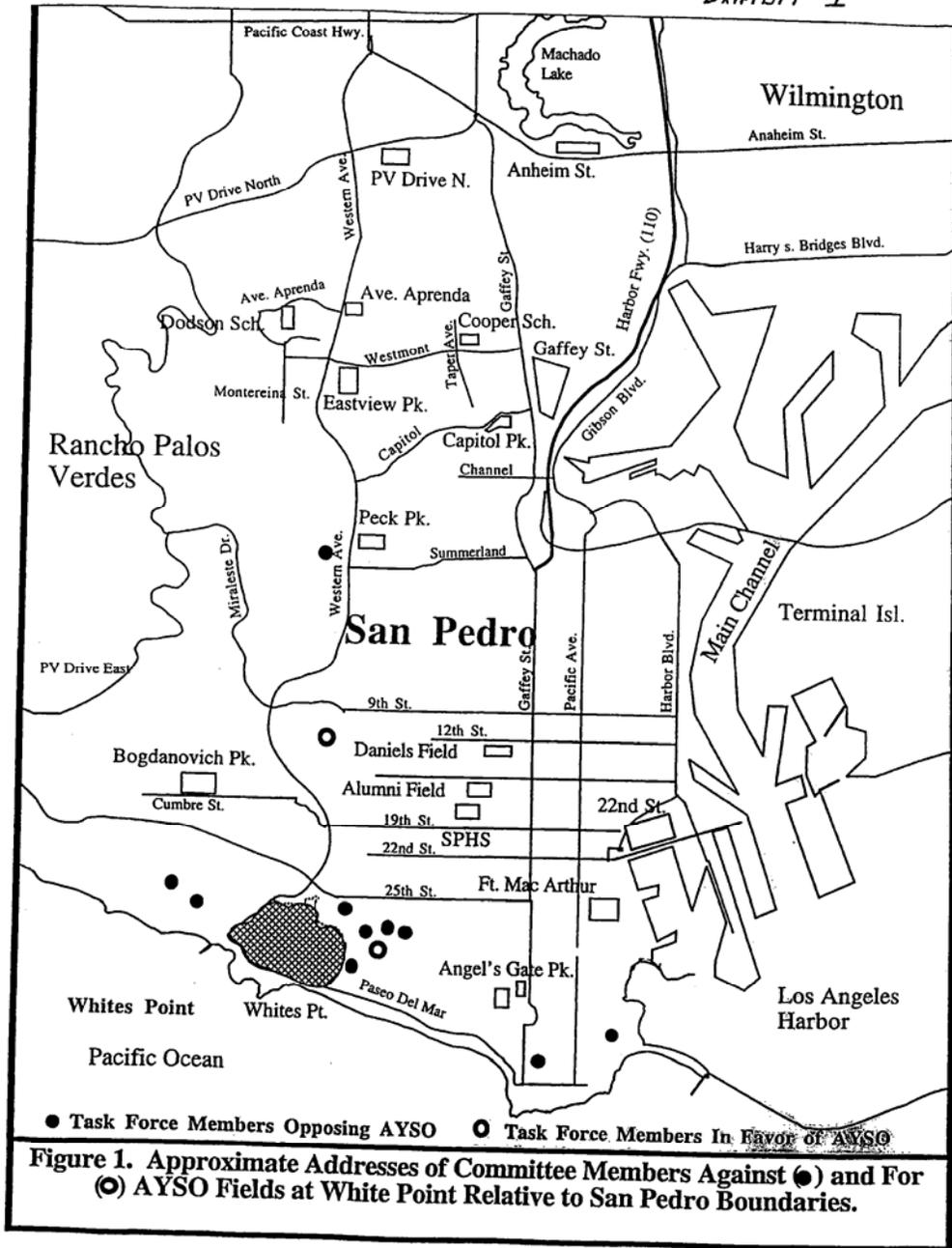


Ralph G. Appy, Ph.D.
Field Development Committee
San Pedro AYSO (Region 6)

28615 Mt. Whitney Way
Rancho Palos Verdes, CA 90275
(310) 832-2046

cc: Honorable Janice Hahn (Councilperson, 15th Council District)
Honorable Bob Nizich (Board Member, Department of Recreation and Parks)
Mr. Al Padilla (California Coastal Commission)

EXHIBIT 1



- K-1 Section 2, "Project Description," of the Draft EIR provides a description of the process used to formulate the proposed project and project objectives. The Whites Point Advisory Committee is advisory in nature and has no powers to make decisions relative to the proposed project. The Board of Recreation and Park Commissioners considered the proposed project objectives and directed the staff to proceed with the environmental document for the proposed project. A soccer field for the area has been proposed and approved for a former landfill site near Gaffey Street, in the San Pedro community. This site is flat and appropriate for use for soccer.
- K-2 The document was submitted to the State Clearinghouse for review as evidenced by the documentation in Appendix A. The number was inadvertently left off the cover. The number is 2001041074.
- K-3 Alternative off-site locations for the proposed project were not considered feasible due to the unique character and associated historic resources. None of the other sites had the unique blend of both a historic resource and the potential for establishment of valuable habitat. No other open space areas had these same unique combination of attributes.
- K-4 The reason for eliminating the use of the site for active recreation was rejected because it did not meet the purpose and objectives of the project as established by the Board of Recreation and Park Commissioners. The discussion of the reasons that this alternative was rejected from detailed consideration was expanded and is found in the errata section of the finalizing addendum. In addition to not meeting the project purpose and objectives, the establishment of active recreation within the site could result in potentially significant and unavoidable impacts associated with lighting, noise and traffic in the area.
- K-4a The Advisory Committee is advisory in nature only. It made its recommendations to the Board of Recreation and Park Commissioners that the project site be developed for a coastal nature preserve and not for active recreation uses. The Commission endorsed these recommendations in December 1999, and directed the staff to prepare the required environmental documents under CEQA in order for the commission to consider adoption of the Master Plan and implementation of other project components. Therefore, there is no need for the appointment of a Neighborhood Council.
- K-4b The project purpose and objectives were determined by the Board of Recreation and Park Commissioners who considered the recommendations of the Advisory Committee in December 1999. This was not an arbitrary decision made by nine people of the Advisory Committee.
- K-4c It is intended that the Gaffey Street facility be used by the AYSO and negotiations are proceeding to accomplish the goal. As stated above, the goals and objectives of the White Point project were determined by the Board of Recreation and Park Commissioners in December 1999, not by the Advisory Committee.
- K-4d As discussed in the EIR, Section 4, "Alternatives," several alternatives were identified that reduced the unavoidable significant impacts to less than significant levels. However,

it is not clear that a soccer field alternative would reduce impacts to the historic resources to less than significant levels. The use of the structures to support the soccer program plus the layout of the fields within the historic district may in itself create a significant impact. There would also be potentially significant impacts associated with biological resources, noise and traffic.

- K-5 Activities at the site have been associated with routine maintenance and security issues at the site. Removal of structures were associated with public safety issues and the removal of vegetation and replanting of some materials. The placement of the rocks were for improvement of security, and did not constitute permanent features at the site. The sign was placed at the site to inform the public of the proposed project, not to indicate that a decision had been made on the project. In summary, there have been no activities at the site that are associated with the actual implementation of the proposed project. A coastal permit is not required for normal operation and maintenance activities.
- K-6 Dr. Appy is correct. As indicated in the EIR (Section 1.6), both the City and the California Coastal Commission were indicated as responsible agencies for Coastal Permitting Requirements. All dedicated City parkland is automatically designated as open space. Applications for coastal development permits are being submitted to both the City Planning Department and the California Coastal Commission. If required, any amendment to the City's Community/General Plan will also be applied for if that is necessary. The text of the Draft EIR has been modified to reflect these potential other uses of the EIR.
- K-7 The use of the site as an ecological preserve is not considered an issue to be resolved nor an area of controversy. No issues were raised during the Board of Recreation and Park Commissioners meeting directing the staff to prepare the environmental document, and this was the only letter that addressed this issue during the review period of the Draft EIR.
- K-8 Environmental justice is not considered a relevant issue with respect to the proposed project. Adequate active recreation facilities are under construction within the area, including the Gaffey Street fields. These facilities are located in a generally industrial area, which is appropriate since they would not generate significant impacts associated with nighttime lighting, traffic and noise on nearby sensitive receptors. This is an appropriate use for such a facility. In addition, lower income children on the east side of the hill would have the opportunity to visit and enjoy a natural area at White Point. White Point Park is expected to be a regional park facility, and is not limited to the local neighborhood. No additional response is required.
- K-9 A public scoping meeting in association with the issuance of the NOP was not held and is not required by CEQA. There was sufficient time to provide written comments as part of this process. The objectives were determined by the Board of Recreation and Park Commissioners and did reflect their awareness of broad community issues. There is no requirement or need to form a neighborhood council for this project or to recirculate a revised document.

California Native Plant Society

SOUTH COAST CHAPTER

01 AUG 10 11:13:05

August 8, 2001

Mr. Paul Davis
L.A. Department of Recreation and Parks
200 N Main Street, Room 209,
City Hall East
Los Angeles, CA 90012

Re: Draft EIR White Point Park Nature Preserve

Dear Mr. Davis,

The South Coast Chapter of The California Native Plant Society had an opportunity to review the above mentioned DEIR.

The White Point area is one of the last natural open spaces left on the Palos Verdes peninsula that are immediately adjacent to the coastal bluffs. It will be of great importance for passive recreational and educational use. We congratulate the City for its vision about the future of White Point Park. We fully support the proposed restoration of native plant communities and habitat in this unique area.

L-1

We did not see any reference in the DEIR to a planned Conservation Easement for the restoration areas. Considering the cost, time and effort needed to implement the proposed measure we strongly recommend a Conservation Easement for this site.

L-2

Sincerely,

Ellen Brubaker

Ellen Brubaker,
President of the South Coast Chapter of CNPS

2220 South Walker
San Pdero, CA 90731
(310) 831 - 2872



Dedicated to the preservation of California native flora



- L-1 Your comment in support of the components of the proposed project that involve the restoration of native plant communities and habitats on-site are acknowledged. The opinion as to its importance for active and passive recreational and educational use will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- L-2 The Draft EIR did not reference a Conservation Easement for the site. At this time, the proposed project does not involve the establishment of a Conservation Easement, as it is currently against the policy of the City. However, the proposed project involves a legally binding agreement between the City of Los Angeles and the PVPLC that will ensure the use of the site as a nature preserve for 20 years. The recommendation to implement a Conservation Easement is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.

FA-XED TO JSA E/B/C



Fort MacArthur Museum Association

Post Office Box 268, San Pedro, California 90731

August 10, 2001

David Attaway
 Environmental Supervisor,
 City of Los Angeles Department of Recreation and Parks
 200 Main Street
 Los Angeles, CA 90012

Dear Mr. Attaway:

The Fort MacArthur Museum Association appreciates the opportunity to comment on the Draft Environmental Impact Report for the White Point Nature Preserve (DEIR). The Fort MacArthur Museum Association has been a stakeholder in the San Pedro community for many years and is actively working to educate by preserving and interpreting the military history of the area.

We wish to register our support for adopting Alternative 3 as outlined in the DEIR for the White Point Nature Preserve. The preservation of the White's Point Historic District will benefit the entire region by educating future generations about San Pedro's vital role in both the Harbor Defenses of Los Angeles and the air defenses of the entire greater Los Angeles basin during the Cold War Era.

M-1

Discussions with the Project Manager lead us to believe that the historic district is fully compatible with the Nature Preserve and the DEIR identifies Alternative 3 as not only feasible but the "environmentally superior alternative."

M-2

We have advocated preservation and rehabilitation of the City owned portions of Fort MacArthur for many years. We are therefore, encouraged by Councilwoman Janice Hahn's interview with the Los Angeles Conservancy concerning the White's Point Nature Preserve. It is refreshing to know that she is committed to historic preservation, and advocates reversing the decision to demolish the historic district at White's Point. We are cautiously optimistic that our often-expressed vision for a thematic historic district based upon the Harbor and Air Defenses of Los Angeles has finally been recognized as a positive element in the development of the community.

M-3

M-4

Possible funding sources for the development of the White's Point historic district include the 2000 Park Bond Act, Community Development Block Grants, and Save America's Treasures. We understand Department managers have already explored the possibility of obtaining Getty Planning Grants for several unrelated projects in the Pacific Region.

M-5

We look forward to working together to make the White Point Nature Preserve an outstanding example of the integration of the rich natural and cultural history of San Pedro.

Respectfully,



Sam Stokes, President
Fort MacArthur Museum Association

- M-1 Your comments in support of Alternative 3 as outlined in the Draft EIR are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- M-2 The conclusion in the Draft EIR regarding Alternative 3 as being the “environmentally superior alternative” is accurate. However, it has not yet been determined whether or not this alternative is feasible. This will be determined in the Findings of Fact during the final deliberations on the project and certification of the EIR.
- M-3 The Department acknowledges your position advocating for the preservation and rehabilitation of the City-owned portions of Fort MacArthur.
- M-4 The City acknowledges your comment regarding the interview of Councilwoman Janice Hahn by the Los Angeles Conservancy. These comments will be forwarded to the decision makers during their deliberations on the EIR. No further response is required.
- M-5 Thank you for your comment regarding possible funding sources for the restoration and preservation of the former military structures. These possible funding sources will be pursued if the decision makers decide to adopt Alternative 3 for the proposed project.

FRIENDS OF WHITE POINT

28544 Montecina Drive
Rancho Palos Verdes, CA 90275

Mr. David Attaway
Environmental Supervisor
Los Angeles Department of Recreation and Parks
200. N. Main St., Room 709
City Hall East
Los Angeles, CA 90012

August 3, 2001

Dear Mr. Attaway:

Friends of White Point represent over 3,000 petitioners who support the future development of White Point Nature Preserve. As co-founders of this group, we strongly support the Master Plan for the White Point Nature Preserve as presented by the White Point Preserve Steering Committee.

N-1

We have reviewed the Environmental Impact Report as presented by Jones & Stokes and are in support of the findings that are in agreement with the Master Plan for the White Point Nature Preserve.

N-2

We feel strongly that the interpretation of the history of the property will be adequately addressed and mitigated as proposed by the Master Plan for the White Point Nature Preserve.

N-3

The White Point Nature Preserve has been a dream of the San Pedro community for over two decades. Under the management of the Palos Verdes Peninsula Land Conservancy, this unique coastal parkland will be transformed in a gentle way to become one of the most desirable places to visit in Southern California. Children will experience the natural terrain and wildlife. As a habitat preserve, White Point will not only benefit the local ecosystem of native vegetation and wildlife, but will provide an important educational and low-impact recreational site for the community. Residents and visitors will freely enjoy all the solitude and peace, scenic vistas and breathtaking sunsets this land has to offer.

N-4

We are anxiously anticipating the completion of the EIR process and implementation of the Master Plan for the White Point Nature Preserve.

Respectfully,

Leah D. Marinkovich *Beth Sohngen*

Leah Marinkovich and Beth Sohngen
Co-founders of Friends of White Point

- N-1 The comment in favor of the Master Plan is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- N-2 Your comments regarding your support of the findings of the EIR and agreement with the Master Plan for White Point Nature Preserve are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- N-3 Your opinion regarding the interpretation of the history of the property being adequately addressed by the Master Plan is acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- N-4 This comment expresses the opinion of the commenter and reflects the overall objectives of the proposed project. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.

Los Angeles Nike Air Defense Veteran's Association

430-A East San Jose Avenue, Burbank, California 91501-2654
(818) 562-1515 Email: evansf@mindspring.com



August 10, 2001

Mr. David Attaway, Environmental Supervisor
City of Los Angeles, Department of Recreation and Parks
City Hall East, Room 709
200 North Main Street
Los Angeles, California 90012

RE: Draft Environmental Impact Report, White Point Park Nature Preserve

Dear Mr. Attaway:

Under provisions of CEQA Guidelines, the Los Angeles Nike Air Defense Veterans Association is delighted responding to the Draft Environmental Impact Report for the White's Point Nature Preserve. This organization did not respond to the Initial Study by Jones and Stokes, during the 30 day comment period with intent. It was determined that a response to the Draft Environmental Impact Report (DEIR) would be the appropriate time to make our position of preservation, rehabilitation and restoration of the Nike Historical Resources known.

After a detailed review of the Draft Environmental Report (DEIR), we concur in part with the adoption of Alternative 3, Nature Preserve and Restoration and Preservation of the Nike Missile Launch Pad Facility, the Warhead Building, the Missile Assembly and Service Building, the Ready Room, and the Three Sentry Buildings, only because it is the one with the least historical resource damage. We will propose herein an additional Alternative we believe will offer the best and only choice.

Their remains however, many glaring inconsistencies that must be challenged. The focal point now must be upon a few very serious defects. The assumption that:

- a. a Master Plan may possibly exist,
- b. the Nike Historical Buildings MUST be destroyed,
- c. no plan exists for restoration, preservation and rehabilitation of the Nike Historical Buildings, and

O-1

d. the Palos Verdes Peninsula Land Conservancy's (PVPLC) Preliminary Plan is incompatible with retaining the above ground buildings.

O-1

For simplification and clarification words are underlined to emphasize and evoke references, ~~strike through to propose deletions~~, **bold to indicate additions** and our *(comments are italicized)*. The following terminology and abbreviations are used throughout this document:

CITY	The City of Los Angeles
DEIR	Draft Environmental Impact Report
EIR	Environmental Impact Report
LA Nike Vets	Los Angeles Nike Air Defense Veterans Association
LANV	Los Angeles Nike Air Defense Veterans Association
ASSOCIATION	Los Angeles Nike Air Defense Veterans Association and the Fort MacArthur Museum Association
FMMA	Ft MacArthur Museum Association
PVPLC	Palos Verdes Peninsula Land Conservancy
PROJECT	Implementation of the "Preliminary Framework Plan for the White Point Nature Preserve"

The "Initial Study" prepared by Jones and Stokes for the City, page 1, paragraph 8, Description of Project: in part "A Framework Plan was Prepared for the Project, which forms the basis for the development of a master plan for the preserve." Further, "The proposed land use improvements for White Point Park includes the following: Removing existing buildings associated with the former Nike Missile Program." Review of the PVPLC "Preliminary Implementation Plan" of November 3, 2000, does NOT call for the absolute removal of the Historic Buildings. Maps of the project infer removal of the buildings since they are not depicted as well as footnote references.

O-2

Where are the Goals and Objectives for defining the Project? Where is the evidence required by CEQA? The only reference we have been able to read is the "Preliminary Framework Plan." Evidently, the Los Angeles Department of Recreation and Parks, the project property owners, have somehow arrived at a conclusion the buildings must go, without the merits of a procedural investigation, without establishing facts and never arriving at accurate conclusions.

O-3

After the nomination hearing in San Luis Obispo, the Palos Verdes Peninsula Land Conservancy commented to the association that existence of the buildings would not impede or interfere with the plans of the PVPLC. Follow-up meetings and conversation reinforce that position. The PVPLV has yet to assert the incompatibility of building retention and the nature preserve project.

O-4

The CEQA Guidelines (as revised) Chapter 1, General, section 15002 General, sets forth the basic "Purposes of CEQA ":

- (a)(2) "Identify the ways that environmental damage can be avoided or significantly reduced."
(a)(3) "Prevent significant, avoidable damage to the environment by requiring changes in projects through use of alternatives or mitigation measures when the government agency finds the changes to be feasible."

and,

(g) Significant Effect on the Environment: A significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project. Further when an EIR identifies a significant effect, the government agency approving the project must make findings on whether the adverse environmental effects have been substantially reduced or if not, why not.

(h) Methods for Protecting the Environment. CEQA requires more than merely preparing environmental documents. The EIR by itself does not control the way in which a project can be built or carried out. Rather when an EIR shows that a project would cause substantial adverse changes in the environment, the government must respond to the information by one or more of the following methods:

- (1) Changing a proposed project;
- (2) Imposing conditions on the approval of the project;
- (4) Choosing an alternative way of meeting the same need;

15004 Time of Preparation

(2)...public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choices of alternatives or mitigation measures, before completion of CEQA compliance. For example the agencies shall not;

- (A) Formally make a decision to proceed with the use of a site which would require CEQA review, regardless of whether the agency has made any final purchase of the site for the facilities, except that agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when an agency has conditioned the agency's further use of the site on CEQA compliance.
- (B) Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.

CEQA Guidelines, Article 13, section 15204 states "persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts of the environment and ways in which the significant effects of the project might be avoided or mitigated." Responding to the

O-5

DEIR we assert issues appropriate to the project and facts surrounding the DEIR's insufficiency. "Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects."

There exists numerous issues of concern.

- a. The conviction of the City to destroy historical resources prior to and regardless of the CEQA procedures.
- b. Failure of the preliminary EIR's investigation and research to consider many significant references.
- c. Failure of the DEIR to formulate a more viable alternative – rehabilitation and future use of the resources.
- d. A continued objective to justify the decision to destroy the historical resources.
- e. Failure to contact, interview or solicit the cooperative support of this association and experts.
- f. Drafting a report which has a definite outcome of supporting historical resource destruction, void of substantial merit, evidence and fact.

O-6

The Goals of CEQA are to identify the significant environmental effects of the agency's actions; and, either:

- a. avoid those significant environmental effects, where feasible; or
- b. mitigate those significant environmental effects, where feasible.

The keywords for the EIR are:

1. Prevent significant, avoidable damage,
2. Requiring changes in projects through use of alternatives or mitigation measures,
3. Agency approving the project must make findings
4. Environmental effects have been substantially reduced or if not, why not,
5. More than merely preparing environmental documents.

This response complies with section 15204(c) to "submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments". It may appear to be redundant since often a response to an issue is basically the same as others. It is appropriate that general issues be raised concerning the DEIR's contents, followed by a brief expansion upon Alternative 3, Nature Preserve and Restoration and Preservation of the Nike Missile Launch Pad, the Warhead Assembly Building, the Missile Assembly and Services Building, the Ready Room, and the Three Sentry Buildings.) Paragraph 4.2.3, page 4-3, Chapter 4, Alternatives Analysis).

A detailed analysis of the DEIR Alternatives and Mitigation, in substance does not "avoid significant environmental impacts", since its objective is founded on destroying significant historical resources which would admittedly ruin the historical integrity of the district. The DEIR fails to support reasons to de-

O-7

stroy the buildings, does not provide facts necessitating destruction, and it fails to establish reasons the buildings are incompatible with the existing "Preliminary Framework Plan" for the White Point Nature Preserve. Cost factors were not analyzed by the City for expenses to retain, preserve, rehabilitate or restore the historical resources as part of the evidentiary process to support destruction.

O-7

As required by CEQA Guidelines, the DEIR provides a Project Overview (page ES-2). In the Project Backgrounds and Objectives section, it calls for removal of the buildings. This section is to define the project, yet nowhere in project reports does it call for building destruction based on factual reasoning. Supposedly, the City has adopted the PVPLC Preliminary Framework Plan as the guiding document, but the PVPLC plan has no firm commitment to destroy the buildings. Over and over the point is hammered home – destroy the buildings.

O-8

The DEIR at best assumes the historical buildings need to be removed, being nothing more than appeasing the local resident homeowner's, who repeatedly assert the buildings are an "eyesore, dilapidated, run down, magnets for vandals, and undesirable". They further attempt to make a convincing argument that the buildings are also unsafe. A report that was provided at the request of Mr. Paul Davis of the Los Angeles Department of Recreation and Parks, written by Krakower and Associates, a licensed architectural and structural engineering firm, unequivocally states otherwise. It is a challenge for them to cite a reference where appearance is justification to destroy historic listed resources. This DEIR is nothing more than adherence to CEQA Guidelines and State Historic Resource Codes to hopefully justify destruction of the buildings identified as the Assembly and Service Building, the Warhead Building, the Ready Room and three Sentry Buildings. Their prejudice is obvious in the letters attached to the DEIR in response to the Initial Study.

O-9

The DEIR on page 4-9 establishes the issue for historical restoration and preservation in the Environmentally Superior Alternative. "All of the significant impacts associated with the proposed project relate to the removal and/or destruction of the Nike Missile Site Historic District. Alternative 3 would result in the restoration, maintenance, and preservation of the major contributors to the Historic District and would result in the fewest impacts. Based on this analysis, Alternative 3 is considered the Environmentally Superior Alternative". However, in conflicting wording, it only references major contributors.

O-10

The DEIR concurs that the historical resources of the Whites Point District are part of a larger district in preparation for nomination. If the buildings, objects and structures are destroyed, this will have a significant impact on diminishing the historical integrity of the district as a whole, including the manner in which Whites Point enhances other historical resources along the Los Angeles coastline.

O-11

CEQA Guideline, Article 7, EIR Process, section 15083, Early Public Consultation, provides that "Prior to completing the draft EIR, the lead agency may also consult directly with any person or organization it believes will be concerned with the environmental effects of the project. Many public agencies have

O-12

found that early consultation solves many potential problems that would arise in more serious forms later in the review process. This early consultation may be called scooping". Sub paragraph (b) further states "Scooping has been found to be an effective way to bring together and resolve concerns of affected federal, state, and local agencies, the proponent of the action, and other interested persons including those who might not be in accord with the action on environmental grounds".

With the potential for Scooping in mind, the Associations on October 24, 2000, submitted a letter to the office of Ellen Oppenheim, General Manager, Department of Recreation and Parks, the City of Los Angeles. It was stated that "...the Fort MacArthur Museum Association would like to go on record as offering our unconditional assistance to the Department in the preparation of their EIR, including our archives and the personal collections....." . Further, "...the Association understands that some flexibility is required in this situation and is therefore willing to discuss alternatives that would not jeopardize the site's current historic designation."

Although Mr. Paul Davis, Los Angeles Department of Recreation and Parks requested and received several documents from the Association, no researchers in developing this DEIR ever attempted to meet with the Association to discuss intentions to preserve and restore, to investigate plans for restoration, rehabilitation and preservation, or discuss issues related to feasible Alternatives and Mitigation. Admittedly meetings and scooping is not a required, however the CEQA Guidelines, section 15087, Public Review of Draft EIR, 5087(i) states "Public hearings may be conducted on the environmental documents, either in separate proceedings or in conjunction with other proceedings of the public agency. Public hearings are encouraged, but not required as an element of the CEQA process". Why has the City meet with the PVPLC, the Steering Committee and members of the community and yet refuse to discuss the alternatives and mitigation with the historical preservation associations. Such refusal will most assuredly lead to potential problems of a serious nature. The preservation associations are prepared to take any and all actions necessary to guarantee the buildings are not destroyed.

One glaring deficiency in the Draft EIR, is making an assumption that the Nike buildings would stand static and not be used. Meetings with the City indicated a willingness to consider restoration options by this association. This association's "Preliminary Analysis and Implementation Plan" details a phased preservation and restoration project, making use of the buildings to house displays that tell the history of the site as well as that of the entire Los Angeles Air Defense Sector. It sets forth estimated costs and treats implementation as a long term project. The costs are yet to be refined, however, they are somewhat in keeping with those proposed by the PVPLC's "Preliminary Framework Plan." Many expected details concerning security, access, interpretation, administration, and grounds restoration of the PVPLC's plans enhance this associations restoration plan. The PVPLC's plan calls for approximately ten years to complete. Based on that timeframe, this Association likewise is looking at a similar commitment.

O-12

O-13

None of the alternatives address the issue of complete restoration and use of the military historical resources. Alternatives require consideration of reasonable options. The city is aware that we have been anticipating a museum setting within the Historic District. In mid January a meeting was held between the City Department of Recreation and Parks, Regional Manager Gat Lum, and both Sam Stokes of the FMMA and Frank Evans of the LANVA. Although details of planned usage for the buildings was not discussed, the basics of the association plan were made known. We discussed at that time our reluctance to consider negotiating resource destruction so early on, when the nomination had not as yet been heard yet. Another meeting was agreed to after the nomination hearing date.

O-13

The City has openly stated it intends one way or another to demolish the buildings and structures, confirming that the CEQA EIR is considered to be nothing more than a rubber stamp process. During the opening statements at the historical nomination hearing in San Luis Obispo on August 12, 2000, the City went on record with having made these statements:

Eric Moody, Deputy for the City Services of the Councilman Svorinich, City of Los Angeles. In his comments to the commission stated:

"Bottom line on this project is that listing or not listing is not going to matter in the final outcome of this property. The department has determined they are going to demolish the buildings. They already have to go through the CEQA process in order to do that. The listing on the historical register, my understanding is, it would only increase the debt the city would have to bare on this."

Commissioner Zamaudio:

"It really concerns me when I hear a public official state that you have already determined your going to tear this down and you haven't gone through the CEQA process".

O-14

Moody:

"We are the property owners of record and we have determined that they need to go. And that will be the final outcome – I'll guarantee that right now."

Zamaudio:

"I am very concerned I am hearing a public official state in public that you have already determined what's going to happen to this property."

Is this not evidence the City has made up its mind before the CEQA process plays out? Mr. Moody introduced himself as an employee of the City and working for the office of the 15th District Councilman, and as well is an interested property owner residing next to the project. It is refreshing knowing the that newly elected 15th District Councilwoman, the Honorable Janice Hahn, has gone on record in an

interview by the Los Angeles Conservancy, in support of reversing the City's decision to destroy the Nike Buildings and preserving the historical buildings at Whites Point Nature Preserve.

After the California State Historical Resources Commission approved the nomination on August 12, 2000, the parties named above, were present at a Steering Committee Meeting at the Department of Recreation and Parks. As part of an exchange dialogue between the attendees, it was clear that an implementation plan was being developed by this association. The Steering Committee requested the plan be completed as soon as possible as it would effect future funding by the PVPLC. Although a specific date was not established for submission, the PVPLC requested completion as soon as possible.

On Wednesday, January 10th, 2001, the two Underground Missile Storage Magazines at Whites Point were opened by the City for conducting an underground tour. Many members of the local neighborhood, the White Point Nature Preserve Steering Committee, and the City Recreation and Parks employees were briefed about the structures and their use by members of FMMA and LANV. We discussed our intention to restore the magazines and the elevators. Comments were made by the City and residents who envisioned tours of the facility. Therefore, none of the preservation issues should come as a surprise since the association has been working on such plans. The PVPLC was given almost two years to develop a preliminary report for the Steering Committee. It may very well take this association an equivalent amount of time to prepare complete plans of our own. Some of the restoration involves 60 foot double steel magazine doors, the hydraulic elevator system, pumping and ventilating systems, valves, electrical motors, lighting, security, painting, building repairs, window replacement, electronic surveillance, security systems and detailed research of historical archives. This is not a simple undertaking.

O-15

CEQA requires that the EIR process determines that the City must be able to support its finding by substantial evidence in the record and must present an explanation of the rationale of each finding. The DEIR is significantly weak in that respect. It contains little and insignificant fact of evidence and does not explain its rationale. It proves no justification for need to destroy. It merely asserts self-serving alternatives.

O-16

CEQA requires the Findings may not be limited to conclusory statements. Although Findings are not part of the DEIR, that document contains little factual information that would support an eventual finding to destroy historical resources. The EIR should supply a logical discussion between the ultimate finding and the facts in the record. The EIR should include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts, however little detail exists.

O-17

CEQA further requires that when alternatives and/or mitigation measures are rejected as infeasible, findings must show the agency's reasons for reaching that conclusion. The costs of Alternatives requiring destruction, versus the cost to retain, preserve and rehabilitate were not investigated. It is the City's responsibility to prove the costs of preservation and restoration are significantly greater than destruction, and money is not available.

O-18

Apparently the City is not seeking maintenance funds, to investigate grants and to obtain local support for restoration, even though possible funding may be available. This association will look into the 2000 Park Bond Act. This act in essence provides grant funds for historic structures within parks, and an \$8.5 million dollar California Heritage Fund grant program for preservation projects administered by the California State Historic Preservation Office. None of the DEIR alternatives detail how the historical buildings could and would be used. The DEIR assumes they would stand idle, without use, although the City is aware of the drafting of plans by the Associations; they fail to disclose that fact. Never did anyone from the City contact the associations to determine the status of the draft plans and possible completion dates. Page ES-11, White Point Nike Launcher Area Missile Site 43L Historic District, however erroneously states, "there are currently no specific proposals for this facility." Another misleading statement.

O-19

Finally, project changes have not been established to substantially lessen the identified significant environmental effect, when alternatives are possible. The City appears ready to approve a project with significant environmental impact that is not based on a fully informed and publicly disclosed decisions.

O-20

The issues we raise in responding to the DEIR should not be taken lightly. The associations are investigating statutory and legal issues and are prepared to defend historical preservation, doing whatever is required. Hopefully the future weeks will lead to open, logical and serious discussions.

O-21

Respectfully,



Frank H. Evans
Board Member, Fort MacArthur Museum Assoc.
Los Angeles Nike Air Defense Veterans Association

Enclosures: As stated

CC:
US Dept of the Interior, NPS
Councilwoman Janice Hahn
SHPO
LA Conservancy
Gat Lum, LA Rec & Parks
Palos Verdes Peninsula Land Conservancy
Susan Brandt-Hauley, Attorney

DRAFT EIR RESPONSE

This response is on a point-by-point basis, citing by subject line, paragraph designation and page numbers, issues raised for further consideration and discussion. For purposes of clarification, the terms preservation, rehabilitation and restoration, are defined below, by the Secretary of the Interior's Standards for the Treatment of Historic Properties:

Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacements and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code required work to make properties functional is appropriate within a preservation project".

Rehabilitation is defined as the act or process of making possible a compatible use of a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural.

Restoration is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

ADDED TO DEIR:

Alternative 6. Nature Preserve and Restoration, Rehabilitation and Preservation of the Two (2) Nike Missile Underground Magazines, the Warhead Building, the Assembly and Service Building, the Ready Room, and the Three Sentry Buildings and Remaining Listed Historical Resources:

This alternative is essentially the same as the proposed project with the exception that restoration, preservation and rehabilitation will be accomplished in a museum setting as forth in the association's "Preliminary Analysis and Implementation Plan," to be revised and adopted by the City, the PVPLC and the Associations in final form as part of the General Plan. Included as an integral part of the implementation plan for preservation, restoration and rehabilitation of the Assembly and Service Building, the Warhead Building, the Ready Room, Three Sentry Buildings and other remaining historical resources

O-22

identified as part of the Historical District listed on the California Register of Historic Resources, to accommodate future reuse of the facilities into the Park. This alternative involves establishing the nature preserve and incorporates the historical resources interpretative program and above ground thematic signing. This alternative was selected to reduce impacts associated with removal of elements of the historic district, does not involve mitigation and resolves issues of degradation of the entire historical districts integrity and significance.

O-22

EXECUTIVE SUMMARY

Project Background and Objectives: (Page ES-2)

"Remove existing vandalized structures that contribute to aesthetic and safety concerns of the surrounding community"

and

"Maintain the major contributing features of the site that present the site's significance in military air defense since World War II."

Project Components (Page ES-3)

"The project can be divided into 4 major components:"

"Removal of existing Nike Missile System structures..."

Removal of Nike Missile Complex Structures (Page ES-5)

"The project site currently contains several structures and foundations that were associated with the Nike Missile program. As part of the project, many of these existing buildings and structures would be removed from the site. The existing Nike Missile launch facility and underground storage magazines would remain in their current condition, secured from public access. Additionally, Battery Paul D. Bunker would remain on-site in its current condition."

(Comment for both Project Background and Objectives, including Components: Proposed destruction is not detailed in the PVPLC Preliminary Framework Plan, which is identified by the city as the authority for the project until completion of the EIR and adoption of a Master Plan. The Preliminary Framework Plans on page 8, "Planning Process", clearly identifies it as the defining document for the project. The above section of the DEIR in effect rewrites the Project in terms that did not previously exist. The Preliminary Framework Plan does not identify specific needs to destroy the buildings and it does not set forth matters of incompatibility with building retention and the Nature Preserve. At their June 7th Meeting of the White Point Citizens Advisory Committee unanimously accepted the Conservancy's proposal, which was latter adopted by the Los Angeles City Council. By what authority does the DEIR have to rewrite terms of the project?

O-23

Summary of Environmental Impacts

Impacts Considered Less than Significant (Page ES-9)

"After an analysis of the environmental impacts and the recommendations for feasible mitigation measures, it was determined that most of the impacts cannot be reduced to less-than-significant levels. These are summarized in table ES-1. The exceptions are discussed below."

(Comment: Table ES-1 needs to be completely revised to coincide with these changes. No alternative was considered in the DEIR for retaining all the historic resources and making appropriate and acceptable use of them. Destruction of the historic resources cannot be properly mitigated based upon the limited evidence provided in the report. The DEIR does not present an Alternative that avoids destruction of the historic resources to less than significant impact. It intentionally sets the stage for destruction of the buildings. To not present alternatives that retains, restores, preserves, and rehabilitates Nike Historic Resources, forces the assumption to destroy. Alternative 6 offers a choice that reduces the impacts to less than significant.)

O-24

Environmentally Superior Alternative (Page ES-10)

(Comment: Impacts on the environment are eliminated by the addition of Alternative 6, which provides for the retention of all historic resources and the adoption of an Implementation Plan which provides for use of the buildings. This would qualify Alternative 6 as the "Environmentally Superior Alternative, instead of Alternative 3)

O-25

Chapter 3, Environmental Impacts and Mitigation Measures

3A.4.2.4 Impact A-4. Demolition and Removal of Features that Convey the Significance of a Significant Historical Resource. (Page 3A-16)

"The proposed project includes demolition of all abandoned foundations within the White's Point Nike Launcher Area Missile Site 43L Historic District and six other buildings:"

- "the Missile Warhead Building"
- "the Assembly and Service Building"
- "the Ready Room Building, and"
- "three Sentry Buildings"

The demolition and removal of these contributing elements of the CRHR listed Historic District constitutes a significant impact.

The City shall incorporate Mitigation Measure A-4 into the proposed project to reduce the magnitude of the impacts on the Historic District.

(Comment: There are no facts contained in the report that adequately mitigates the impact which results from destruction of the buildings. Only Alternatives 6, as proposed, avoids the need to mitigate significant impact.)

O-26

Chapter 4, Alternatives Analysis

ADDED:

Alternative 6. Nature Preserve and Restoration, Rehabilitation and Preservation of the two (2) Nike Missile Underground Magazines, the Warhead Building, the Assembly and Service Building, the Ready Room, and the Three Sentry Buildings and Remaining Listed Historical Resources:

This alternative is essentially the same as the proposed project with the exception that restoration, rehabilitation and preservation will be accomplished in a museum setting as detailed in the association's "Preliminary Analysis and Implementation Plan," to be revised and adopted by the City, the PVPLC and the Associations, and incorporated into the Project General Plan. Included as an integral part of the implementation plan for preservation, rehabilitation and restoration is the Assembly and Service Building, the Warhead Building, the Ready Room, the Three Sentry Buildings and other remaining historical resources identified within the Historical District listed on the California Register of Historic Resources. This alternative involves establishing the PVPLC nature preserve detailed in the "Preliminary Framework Plan along with the association Preliminary Analysis and Implementation Plan." It offers an option which will reduce or eliminate impacts associated with removal of portions of the historic district, it does not involve mitigation and it resolves issues of degradation of the entire historical districts integrity and significance.

(COMMENTS: No Alternative considered complete and proper restoration, preservation and rehabilitation of the resources, leading to use of the buildings and avoiding destruction and mitigation. This association strongly believes this is the only alternative that can qualify for adoption under CEQA Guidelines and the California State Resource Code.)

O-27

RESPONSE SUMMARY:

For years, the City has been on the course of destruction. Many letters have been written and reports rendered. Buildings have been demolished, resources destroyed, alterations have been made, artifacts removed from the site, both before and after the historical listing in August 2000. More than once the City has promised to destroy the Nike Site to appease the homeowners, regardless of the degradation of the historical integrity of this and larger districts. This DEIR is a continued effort to minimally meet with statutory requirements and eventually destroy the historical district.

Even though the CEQA EIR process has played out this far, it is never too late to propose negotiation and mutual agreements. The associations propose a meeting of all parties, the City, the PVPLC, the Los Angeles Conservancy, the Steering Committee Members, and the Historical Associations to resolve conflicting issues in a mutually acceptable manner. If we can agree to a common plan of preservation, restoration and rehabilitation, the historical value, integrity and significance is maintained and the deteriorated, vandalized conditions as justification to destroy is mitigated.

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- O-1a As discussed in Section 2.1 of the Draft EIR, a draft master plan has been prepared, which is the primary basis for the proposed project. This draft master plan was available for review during the Draft EIR public review period at the Department of Recreation and Parks.
- O-1b The proposed project includes the demolition of some of the former Nike Missile site structures because of aesthetic and safety concerns. The historic values of these structures have been addressed in the Draft EIR. The decision to implement the proposed project, including demolition of the historic Nike Missile buildings, will be made by the Board of Recreation and Park Commissioners, at the time when the Final EIR is presented to them for certification.
- O-1c A preliminary proposal for the restoration and preservation of the military buildings was submitted after the completion of the public review period for the Draft EIR. This plan is in the process of being reviewed by the Department for further consideration, but has not been considered or approved by the Board of Recreation and Parks Commissioners.
- O-1d The proposed project consists of the development of a nature preserve and demolition of the historic Nike Missile buildings. The PVPLC plan and the Draft EIR never indicate the buildings must be demolished to make way for the nature preserve. In fact, the PVPLC plan can be implemented irrespective of the decision that is ultimately made on the fate of the buildings.
- O-2 It is true that the framework plan and the Master Plan do not call for demolition of the structures. The proposed demolition of the structures is actually a separate action to the adoption of the Master Plan under the proposed project.
- O-3 The project objectives are provided in Section 2.1 of the EIR. The EIR itself is the document used to consider the environmental impacts of the proposed project as well as to consider the alternatives to the proposed project. Only after consideration and the certification of the EIR can the Board of Recreation and Park Commissioners and the City Council make a decision on the proposed project.
- O-4 Preservation of the buildings would be compatible with the implementation of the Master Plan as presently proposed.
- O-5 Mr. Evans accurately describes the CEQA issues in the Article cited. No response is required.
- O-6a The City has not made any decision whether or not to proceed with any demolition of structures. The City will consider the environmental impacts of the proposed project and will certify the Final EIR before any decision is made on implementation of the proposed project or alternatives.

- O-6b The EIR did involve considerable investigation and research of documents and other information. Since specific references are not cited by Mr. Evans, no further response can be made.
- O-6c The alternatives provided in the EIR provided conceptual alternatives for preservation and potential reuse of the structures. It is not the requirement of CEQA to fully develop alternatives beyond the point of establishing that an alternative would be potentially feasible.
- O-6d The proposed project does involve the demolition of some structures as an objective. It is appropriate to include this as part of the proposed project and is required by CEQA. The project objectives do not justify the decision on the project; the Findings of Fact and any Statement of Overriding Considerations will adequately support the final decision. A thorough analysis of this proposal was conducted in the EIR and the loss of these structures were considered an unavoidable adverse impact.
- O-6e A notice of preparation was sent out to a wide variety of agencies and interested groups. Any information that was provided was considered in the preparation of the Draft EIR. Any information that your group sent was considered in the EIR. Additionally, a detailed literature review was also provided.
- O-6f The Draft EIR addressed the impact of the demolition of the above ground structure since that is part of the proposed project objectives. It is required to address the impacts of such an action, but is not required to justify the proposed project.. The EIR provides an unbiased assessment of the impact of the proposed project.
- O-7 The purpose of the EIR is to identify significant impacts and to mitigate significant impacts where feasible. The proposed project did identify the loss of the historical resources as a significant and unavoidable impact. The demolition of the structures is not part of the Master Plan, but is also a part of the proposed project and project objectives.
- O-8 No Master Plan has been adopted and no decision has been made as to demolition of the buildings. The purpose of the EIR is to determine the impacts of such a proposal, not to justify it.
- O-9 The DEIR provides an analysis of the impacts of the proposed project and all comments received on the project are incorporated into the DEIR.
- O-10 The term of major contributors in this context was used to describe those structures remaining on the site.
- O-11 The EIR is in agreement with this statement and no response is required.
- O-12 The historic and prehistoric resources of the project site was independently evaluated by cultural resource scientists expert in Cold War related resources. They used the resources necessary to evaluate the proposed project and also evaluated alternatives as to their

potential to reduce significant impacts as well as the general feasibility of the alternative. The goal of the alternative analysis was not to provide detailed information on the design or methods of implementation of the alternatives to the proposed project, but to establish its feasibility. This was accomplished without detailed meetings.

- O-13 Alternative 3 assumes that a wide range of preservation or reuse options could be accomplished. Those uses described under this comment would be compatible with this option.
- O-14 No decision has been made on this project. Any comments made were the opinion of the individual employee and does not necessarily reflect any decision to be made on the proposed project by the Board of Recreation and Parks or the City Council.
- O-15 If Alternative 3 were implemented, it is envisioned that there would be sufficient time to develop restoration plans and to identify and obtain funding for any preservation/restoration efforts.
- O-16 The Draft EIR does not provide findings. The findings are provided after the completion of the Final EIR.
- O-17 As Mr. Evans correctly states, the findings are not part of the Draft EIR and will be prepared prior to a decision on the proposed project. It is our opinion that the Draft EIR provides sufficient information upon which to base project findings.
- O-18 Preservation and restoration of the site was considered a feasible alternative to the proposed project. In fact, the Draft EIR identifies Alternative 3 of as the environmentally superior alternative.
- O-19 If Alternative 3 were implemented, there would be sufficient opportunity to gain funds for restoration of the site and to develop any reuse plans. It should be noted, that depending upon the reuse plans, additional CEQA documentation may be required.
- O-20 The EIR provides a detailed document that fully defines the proposed project and alternatives upon which the decision makers can make a decision on the project.
- O-21 All comments made about the Draft EIR will be given a response.
- O-22 We believe that Alternative 3 is sufficiently similar to this alternative so that an additional alternative would not be necessary. As envisioned, Alternative 3 would have the ability to involve the implementation of these actions, if the decision makers determined that this alternative should be implemented.
- O-23 Mr. Evans is correct in that the master plan does not involve the demolition of any structures. The proposed project includes both the implementation of the Master Plan and the demolition of the structures.

- O-24 Table ES-1 is correct. Alternative 3 would reduce the impact to less than significant levels and is considered the Environmentally Superior Alternative.
- O-25 We do not agree that the adoption of Alternative 6 is necessary because it would be possible to include those elements in Alternative 3.
- O-26 Alternative 3 would reduce significant unavoidable impacts to less than significant levels.
- O-27 We do not agree that Alternative 6 is the only alternative that can qualify for adoption under the CEQA Guidelines. Alternative 3 is flexible enough to allow the complete and proper restoration, preservation and rehabilitation of the historical resources. Therefore, no additions to the Draft EIR are necessary.



LOS ANGELES CONSERVANCY

523 W. Sixth Street • Suite 1216 • Los Angeles, California 90014 • 213/623-2489

August 10, 2001

David Attaway
Environmental Supervisor, Dept. of Recreation and Parks
City of Los Angeles
200 N. Main St, Room 709
Los Angeles, CA 90012

RE: White Point Park Nature Preserve Master Plan Draft EIR

Dear Mr. Attaway:

Thank you for the opportunity to comment on the White Point Park Nature Preserve Master Plan Draft Environmental Impact Report (DEIR). The Los Angeles Conservancy is the largest local non-profit preservation organization in the nation with over 7200 members. We work with the communities and cities throughout Los Angeles County to protect the cultural resources of the region.

The Conservancy agrees with the basic findings made in the DEIR regarding the historic resources at the site and the adverse impacts that would result from the proposed project. We are pleased that the DEIR confirms that there are two feasible alternatives that will preserve the historic resources at the site associated with the Nike Missile Site 43L Historic District. Alternative 3, which incorporates restoration and preservation of the significant structures in the historic district, has been determined in the DEIR to be both feasible and the environmentally superior alternative, meeting the majority of the project objectives. Alternative 2 also supports the preservation and stabilization of the contributing structures in the historic district, allowing these structures to be mothballed until such time as an appropriate use can be determined. | P-1
| P-2
| P-3

Section 21002 of the CEQA statute states, "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." Additionally, Section 21081 states that "no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment," unless the alternatives stated in the EIR are proved infeasible and the lead agency determines that the benefits of the project outweigh the significant effects on the environment. The DEIR clearly states that both Alternative 2 and 3 are feasible, thereby negating the possible adoption of a Statement of Overriding Consideration. | P-4
| P-5
| P-6

Given that there are two feasible alternatives that would substantially "lessen the significant environmental effects" of the project in the DEIR, it is the responsibility of the lead agency to adopt either Alternative 2 or 3. | P-7

Additionally, the Conservancy would like to address an apparent inconsistency within the project objectives as defined in the DEIR. Objective 5 listed in Section 2-2 (Remove existing vandalized structures that contribute to the aesthetic and safety concerns of the surrounding community.) seems counter to Objective 6 (Maintain the major contributing features of the site that present the site's significance in military air defense since World War II.). Clearly, the "existing vandalized structures" and the "contributing features of the site" are one and the same. The demolition of these historic structures due to aesthetic and safety concerns would be rendered unnecessary if the structures in question were preserved and maintained.

P-8

Several possible funding sources may be available to offset the cost of the restoration and preservation. The 2000 Park Bond Act (Roberti-Z'berg Harris Program) provides grant funds for historic structures within parks and the California Heritage Fund, administered through the Office of Historic Preservation, an \$8.5 million grant program for preservation projects.

P-9

We look forward to working with the Department of Recreation and Parks to protect and preserve all of the historic resources at the White Point Park Nature Preserve. We commend the department for their efforts to create a resource for the citizens of Los Angeles that illustrates both the natural and cultural history of our city.

P-10

Sincerely,

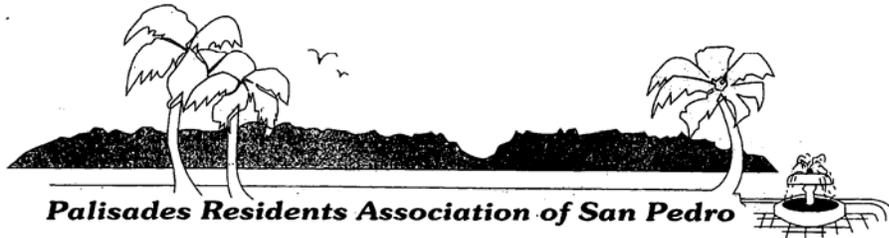


Trudi Sandmeier
Preservation Advocate
Los Angeles Conservancy

Cc: Sam Stokes, Fort MacArthur Museum Assoc.
Councilwoman Janice Hahn
Knox Mellon, CA Office of Historic Preservation

- P-1 The Draft EIR concludes that the proposed project would result in significant adverse impacts to historical resources. The Department acknowledges your agreement with the basic findings in the Draft EIR regarding the historic resources.
- P-2 The alternatives identified and analyzed within the EIR have not yet been determined to be feasible. These alternatives were provided and analyzed due to their ability to reduce significant impacts associated with the proposed project. The feasibility will be determined in the Findings of Fact made by the decision makers during the deliberations on the EIR and the proposed project.
- P-3 Alternative 3 has been identified as the Environmentally Superior Alternative, which incorporates restoration and preservation of the former military structures, and Alternative 2 would preserve and stabilize the structures in their current conditions. However, it should be noted that the alternatives identified and analyzed within the EIR have not yet been determined to be feasible. These alternatives were provided and analyzed due to their ability to reduce significant impacts associated with the proposed project. The feasibility will be determined in the Findings of Fact made by the decision makers during the deliberations on the EIR and the proposed project.
- P-4 The City acknowledges Section 21002 of the CEQA statute, which states, "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects..." However, the Conservancy fails to acknowledge the subsequent portion of the same statute that states, "The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof." As stated in Section 21002.1(c), "If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project the project may nonetheless be carried out or approved at the discretion of a public agency..." Furthermore, in accordance with Section 21081, a public agency may find that "specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment."
- P-5 The Department believes that the Conservancy has omitted portions of Section 21081 of the CEQA Statute related to Findings of Fact. This section provides that a public agency should not approve or carry out a project unless the agency makes specific economic, legal, social, technological, or other considerations that make infeasible the mitigation measures or alternatives identified in the environmental impact report (PRC 21081(a)(3)). Furthermore, the agency may determine that specific overriding economic, legal, social, technological, or the benefits of the project outweigh the significant effects on the environment. The alternatives identified and analyzed within the EIR have not yet been determined to be either feasible or infeasible. These alternatives were provided and analyzed due to their ability to reduce significant impacts associated with the proposed project. The feasibility will be determined in the Findings made by the decision makers during the deliberations on the EIR and the proposed project.

- P-6 The EIR does not state that the alternatives identified and analyzed are feasible. These alternatives were provided and analyzed due to their ability to reduce significant impacts associated with the proposed project. The feasibility will be determined in the Findings of Fact made by the decision makers during the deliberations on the EIR and the proposed project.
- P-7 The Department acknowledges the Conservancy's opinion that the agency should adopt either Alternative 2 or Alternative 3. However, as stated previously, the alternatives identified and analyzed within the EIR have not yet been determined to be feasible, and their feasibility will be determined in the Findings of Fact made by the decision makers during the deliberations on the EIR and the proposed project.
- P-8 This comment expresses the opinion of the commenter that Objectives 5 and 6 seem to counter one another. The Department does not believe that these objectives are one in the same nor contradictory. The objective to "maintain the major contributing features of the site that present the site's significance in military air defense since World War II" is intended to refer to the preservation of the Battery Paul D. Bunker, and the Nike Missile Launch Pad and Underground Storage Magazines. As presented in the DEIR, these are the most central and evocative components of the Historic District, which will evoke historic relationships of the buildings and structures of the entire facility as well as the relationship to the larger Fort MacArthur installation and the Los Angeles Harbor Defense network. The presence of the remaining Nike Launch pad facility and the Battery Paul D. Bunker would convey the important role that the Nike facility played in the transition between WWI air defense and Nike missile defense programs. While the DEIR recognizes that the demolition of the other structures would be a significant impact, these are not recognized as major contributors to the District. Additionally, the objective to remove "existing vandalized structures that contribute to aesthetic and safety concerns of the surrounding community" is intended to respond to the objectives of the "proposed project" and the community's concerns regarding these facilities.
- P-9 Thank you for your comment regarding possible funding sources for the restoration and preservation of the former military structures. These possible funding sources will be pursued if the decision makers decide to adopt Alternative 3 for the proposed project.
- P-10 Thank you for your comment in commendation of the efforts to create a resource for the citizens of Los Angeles. The Department is open to working with the Conservancy with regards to the historic resources at White Point.



August 7, 2001

Mr. David Attaway, Environmental Supervisor
City of Los Angeles Department of Recreation and Parks
City Hall East, Room 709
200 N. Main St.
Los Angeles, CA 90012

By mail and fax to: (213) 617-0439

Reference: Draft Environmental Impact Report, White Point Park Nature Preserve

Dear Mr. Attaway:

Thank you for this thoughtful and complete Draft Environmental Impact Report (DEIR). Please refer also to our letter of May 7, 2001, commenting on the Notice of Preparation for this DEIR.

Q-1

We strongly support this project as proposed in the DEIR. The land uses and developments described in the project are exactly what we had hoped for. We are in total agreement with this configuration of the project, and we trust that it will go forward exactly as described. We note that the project as proposed follows very closely the recommendations of the White Point Park Advisory Committee, on which many of our members served.

Q-2

We are strongly opposed to all of the Alternatives presented in the DEIR. We believe that each of them would detract from the community's clearly expressed preference for a nature preserve on this site. As we said in our above referenced letter of May 7, 2001, we are committed to the removal of the derelict, nuisance, existing buildings from the site, as provided for in the project. Again, the files of the Department are filled with our letters on this issue, so we will not belabor the point.

Q-3

Q-4

We believe that this project will create a spectacular resource, not only for our community, but for all of Los Angeles and Southern California. It will restore native plant communities which have been essentially lost. It will create valuable wildlife habitat. It will be a priceless educational resource. Finally, we are very excited about the unique public/private partnership which has come together, to allow public fund raising and "sweat equity" to combine with City resources to move this project forward.

Q-5

Sincerely,

A handwritten signature in black ink, appearing to read "Noel Park", written in a cursive style.

Noel Park
President

P.O. Box 5281 San Pedro, CA 90733

- Q-1 Thank you for your comment regarding the completeness of the Draft EIR. The reference to the letter dated May 7, 2001, commenting on the Notice of Preparation, has been included as an Appendix to the Draft EIR and was considered during the preparation of the Draft EIR.
- Q-2 The comment in favor of the proposed project is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- Q-3 The comment in opposition to the Alternatives presented in the EIR expresses the opinion of the commenter that the alternatives would detract from the community's preference for a nature preserve. The comment is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- Q-4 The removal of historic buildings at this site is included as one of the components of the "proposed project" that is analyzed in the EIR. The comment in support of removal of these buildings is acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project. It should also be noted that alternatives to retain, preserve, and/or restore the existing buildings may also be considered by the decision makers during their deliberations on the project. No issues regarding the adequacy of the EIR are provided.
- Q-5 This comment expresses the opinion of the commenter and reflects the project objectives. No issues regarding the adequacy of the EIR are provided.



August 12, 2001

Mr. David Attaway
Environmental Supervisor, City of Los Angeles
Department of Recreation and Parks
200 N. Main Street, Room 709
City Hall East
Los Angeles, California 90012

Dear Mr. Attaway,

The Palos Verdes Peninsula Land Conservancy (PVPLC) is a non-profit, public benefit corporation dedicated to the preservation of undeveloped land in perpetuity as open space for historical, educational, ecological, passive recreation and scenic purposes. On behalf of the Board of Directors of the Palos Verdes Peninsula Land Conservancy, I am pleased to report our unanimous support for the Master Plan for the White Point Nature Preserve as presented in the Draft Environmental Impact Report of June 2001.

R-1

For the past 15 months the Palos Verdes Peninsula Land Conservancy has chaired The White Point Nature Preserve Steering Committee that has held regularly scheduled and noticed public meetings to discuss issues and develop recommendations for the White Point Nature Preserve. In November of 2001, the PVPLC developed and broadly circulated the Preliminary Framework Plan for the White Point Nature Preserve as approved by the steering committee. The committee continued to meet for the following nine months to take public comment on the preliminary plan and further refine the policies and objectives for the Master Plan. The committee has been committed to providing a public forum for the discussion of issues pertaining to the development of the Master Plan and appreciates the opportunity for public review of the DEIR.

R-2

The PVPLC has submitted State and Federal grant requests to fund the White Point Nature Preserve Master Plan totaling \$1,316,000 of which \$1,300,000 is identified as having very high probability of award. The PVPLC has full confidence that these requests will provide the necessary funding to implement the Master Plan as proposed in the DEIR, and will provide accessible natural parkland for broad regional use and enjoyment. Our community is excited by the opportunities for passive recreation, education, and enhancement of the ecological value of the preserve called out in the Master Plan. The PVPLC remains neutral as to the disposition of the military structures so long as these decisions do not adversely impact the ability to open the park to the general public in a safe, timely and financially feasible manner.

R-3

R-4

We look forward to continuing involvement with the Department of Recreation and Parks as we begin implementation of this excellent Master Plan.

Sincerely,

William Ailor, Ph.D., President
Palos Verdes Peninsula Land Conservancy

Palos Verdes Peninsula Land Conservancy • PO Box 3427 • Palos Verdes Peninsula, CA 90274
(310) 541-7613 • E-Mail: PVPLC@aol.com • Home Page: <http://www.pvplc.org>

- R-1 Your comments regarding the support for the Master Plan for the White Point Nature Preserve as presented in the EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- R-2 The Department acknowledges the PVPLC efforts to provide public input opportunities during the preparation of the Master Plan. In addition, CEQA requires public involvement during the preparation of an EIR. Public notice was provided for a 30-day period for the Notice of Preparation of an Environmental Impact Report, and a 45-day public review period was provided for the Draft EIR. No other issues regarding the adequacy of the EIR are provided.
- R-3 The Department acknowledges the grant requests pursued by the PVPLC and the expectations of funding from these sources. No other issues regarding the adequacy of the EIR are provided.
- R-4 The comments regarding the neutral position of the PVPLC as to the disposition of the military structures is acknowledged. As indicated in the EIR, the proposed project involves the removal of several former military structures. However, alternatives are presented in the Draft EIR, which involve retention, preservation, and/or restoration of these structures. The decision makers will have the ultimate authority on the selection of either the proposed project or one of the alternatives. Regardless of whether the proposed project or one of the alternatives is selected, the nature preserve component of the project is not expected to be affected by the final decision.

SAN PEDRO AND PENINSULA HOMEOWNERS' COALITION

Member Associations
Averill Park - Barton Hill - Casa Verde Estates - Downtown Residents - Leland Park
Palisades - Palos Verdes Shores - Peck Park/Holy Trinity - Point Fermin - Rolling Hills Riviera
San Pedro Homeowners United - South Shores - Vista Del Oro - Westmont No. 4

P.O. Box 1106, San Pedro, CA 90733
(310) 832-5720 (evening) (562) 804-5205 (day) Fax (562) 804-5210
August 6, 2001

Mr. David Attaway, Environmental Supervisor
City of Los Angeles Department of Recreation and Parks
City Hall East, Room 709
200 N. Main St.
Los Angeles, CA 90012

By mail and fax to: (213) 617-0439

Reference: Draft Environmental Impact Report, White Point Park Nature Preserve

Dear Mr. Attaway:

Thank you for this thoughtful and complete Draft Environmental Impact Report (DEIR). Please refer also to our letter of May 7, 2001, commenting on the Notice of Preparation for this DEIR.

S-1

We strongly support this project as proposed in the DEIR. The land uses and developments described in the project are exactly what we had hoped for. We are in total agreement with this configuration of the project, and we trust that it will go forward exactly as described. We note that the project as proposed follows very closely the recommendations of the White Point Park Advisory Committee, on which many of our members served.

S-2

We are strongly opposed to all of the Alternatives presented in the DEIR. We believe that each of them would detract from the community's clearly expressed preference for a nature preserve on this site. In addition, we are clearly on record as supporting the long held desire of our member association, the Palisades Residents Association, to have the derelict, nuisance, buildings removed from the site.

S-3

S-4

Again, we believe that this park will be a spectacular resource, not only for our community, but for all of Los Angeles and Southern California. It will restore native plant communities which have been essentially lost. It will create valuable wildlife habitat. It will be a priceless educational resource. Finally, we are very excited about the unique public/private partnership which has come together, to allow public fund raising and "sweat equity" to combine with City resources to move this project forward.

S-5

Sincerely,

Noel Park
President

- S-1 Thank you for your comment regarding the completeness of the Draft EIR. The comment letter dated May 7, 2001, commenting on the Notice of Preparation has been included as an Appendix to the Draft EIR and was considered during the preparation of the Draft EIR.
- S-2 The comment in favor of the proposed project is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- S-3 The comment in opposition to the Alternatives presented in the EIR expresses the opinion of the commenter that the alternatives would detract from the community's preference for a nature preserve. The comment is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- S-4 The removal of historic buildings at this site is included as one of the components of the "proposed project" that is analyzed in the EIR. The comment in support of removal of these buildings is acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project. It should also be noted that alternatives to retain, preserve, and/or restore the existing buildings may also be considered by the decision makers during their deliberations on the project. No issues regarding the adequacy of the EIR are provided.
- S-5 This comment expresses the opinion of the commenter and reflects the project objectives. No issues regarding the adequacy of the EIR are provided.

SOUTH SHORES HOMEOWNERS' ASSOCIATION

SOUTH SHORES

August 11, 2001

P. O. BOX 922
SAN PEDRO, CALIFORNIA 90733

Mr. David Attaway, Environmental Supervisor
Los Angeles City Department of
Recreation and Parks
200 North Main Street, Room 709
Los Angeles, CA 90012

Dear Mr. Attaway:

Subject: White Point Park Nature Preserve Master Plan
Comments relative to Draft Environmental Impact Report (EIR)

A number of members of the South Shores Homeowners Association have been actively involved in developing the White Point Park Nature Preserve Master Plan. In fact, the undersigned chaired the Citizens' Committee which recommended the plan to your Department for implementation. We have also participated in several recent volunteer clean-ups of the site in cooperation with the Palos Verdes Peninsula Land Conservancy. We have also reviewed the Notice of Preparation and Draft EIR in detail.

We believe that the Draft EIR has been prepared in an appropriately thorough and professional manner and have no specific comments on its content. The Association would like to go strongly on record in favor of the project as described in the subject document. We do not support Alternative #3 which preserves several dilapidated buildings relative to the site's former usage as a Nike site. We do, however, support honoring the memory of such usage through appropriate exhibits, plaques and interpretive information on site as well as at the Army Historical Museum at Angel's Gate Park, approximately one mile to the east of White Point.

T-1
T-2
T-3

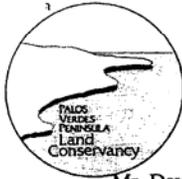
Hopefully, the Final EIR for the project can be completed in the near future and the necessary work can begin toward implementing the proposed improvements and open the site to public usage after more than 25 years of closure and neglect.

Sincerely yours,



Vernon E. Hall
President

- T-1 Thank you for your comment regarding the appropriate and professional manner in which the EIR was prepared. As indicated in the letter, no specific comments are provided on the content. Therefore, no further response is required.
- T-2 The comment in favor of the proposed project and in opposition to Alternative 3 is acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project.
- T-3 As indicated in the project description, no specific interpretive program has been proposed to date. However, mitigation measures identified within Chapter 3A, would provide a means to develop interpretive information for the historical and cultural resources onsite, which would honor the memory of the historic use of the site. The location of this interpretive information has also not yet been determined. The suggestion to include this information at the historical museum at Angel's Gate Park will be considered during the implementation of the mitigation program.



Mr. David Attaway
Environmental Supervisor, City of Los Angeles
Department of Recreation and Parks
200 N. Main Street, Room 709
City Hall East
Los Angeles, California 90012

Dear Mr. Attaway,

On behalf of the White Point Nature Preserve Steering Committee, I am pleased to report unanimous support for the proposed project as presented in the White Point Park Nature Preserve Draft Environmental Impact Report of June 2001. The committee feels that a thorough and fair investigation of potential environmental impacts of the proposed project has been conducted and reported by the firm of Jones & Stokes. The Committee looks forward to the implementation of the Master Plan that will provide accessible natural parkland for broad regional use and enjoyment, passive recreation and education opportunities and enhancement of the ecological value of the preserve.

U-1

U-2

The 13 member, White Point Nature Preserve Steering committee was appointed in May of 2000 by the District 15 Council Office and the Department of Recreation and Parks to provide community-based oversight for the development of the Master Plan. The committee consists of a broad cross-section of the community and includes members from the Palisades Residents Association, South Shores Homeowners Association, Point Fermin Residents Association, Friends of White Point, White Point Citizen's Advisory Committee, South Bay Chapter of the Audubon Society, the Sierra Club and veterans of World War II.

U-3

For the past 15 months the committee, working in conjunction with the Palos Verdes Peninsula Land Conservancy, has held regularly scheduled and noticed, public meetings to discuss issues and develop recommendations for the White Point Nature Preserve. A period for public comments was provided for on the agenda of every monthly meeting. The committee developed and broadly circulated the Preliminary Framework Plan for the White Point Nature Preserve in November of 2001. The committee continued to meet for the following 9 months to take public comment on the preliminary plan and further refine the policies and objectives for the Master Plan. The committee has been committed to providing a public forum for the discussion of issues pertaining to the development of the Master Plan and appreciates the opportunity for public review of the DEIR.

U-4

Sincerely,

Loren DeRoy,
White Point Nature Preserve Steering Committee, Chairman

- U-1 Your comments regarding the support for the proposed project as presented in the EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- U-2 Thank you for your comment regarding the thorough and fair investigation of potential impacts of the proposed project. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- U-3 The Department acknowledges the broad cross-section of the community that the Steering Committee represents, and appreciates the efforts to include the community during the development of the Master Plan. No other issues regarding the adequacy of the EIR are provided.
- U-4 Thank you for your comment regarding the opportunity for public review of the DEIR. The City acknowledges the public outreach conducted by the PVPLC in coordination with the Steering Committee. In addition, CEQA requires public involvement during the preparation of an EIR. Public notice was provided for a 30-day period for the Notice of Preparation of an Environmental Impact Report, and a 45-day public review period was provided for the Draft EIR. No other issues regarding the adequacy of the EIR are provided.

Mr. David Attaway, Environmental Supervisor
City Hall East Room 709
200 N. Main Street
Los Angeles, CA 90012

August 8, 2001

"I think that each town should have a park, or rather a primitive forest, of five hundred or a thousand acres, either in one body or several, where a stick should never be cut for fuel, nor for the navy, nor to make wagons, but to stand and decay for higher uses...a common possession forever, for instruction and recreation."

Henry David Thoreau
Winter Fruit, 1860

V-1

It is high time that we all heed this man's advice. We strongly approve of the project as it is proposed. In today's world, as it would appear in Thoreau's world, a simple plan as this is indeed visionary in that it demonstrates that we humans are learning to better care for our planet. What better legacy is there for future generations than a 102-acre plot of Southern California Coastline, restored with native habitat and plant communities.

We would like to address Alternative 3 in the Executive Summary of the Draft EIR. We were in attendance at the meeting of the California Register of Historic Resources Commission in San Luis Obispo, August, 2000, when it was voted to place the Nike Missile Site on the list of historic resources. At the close of the meeting it was made clear to the community members present that the fact of the site being declared of historical significance did not dictate the future disposition of the above ground units that have deteriorated to mere shells of buildings. The launching pad and the World War II gun emplacements are, of course, part of the landscape and of the project site. We are pointing out the distinction between those facilities and the six scattered and crumbling units..

V-2

V-3

We look forward to the implementation of the White Point Nature Preserve Master Plan.

Sincerely,



James and Veralee Bassler
3702 Weymouth Avenue
San Pedro, CA 90731 (310) 832-6274

- V-1 Your comment in support of the project as it is proposed is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- V-2 The future disposition of the above-ground former military structures is not necessarily determined by the historical significance. The placement of the historic district on the California Register of Historic Resources acknowledges the historic significance that the site has played in history, specifically that of the evolution of the air and harbor defense military system in Los Angeles. Thus, when determining the significance of removing any portion of this designated historic district, a finding must be made in accordance with CEQA that the project as proposed would have a "significant" impact. Concluding that the project would result in a significant impact does not necessarily preclude the removal of the buildings, if the decision makers state that there are social, economic, and other beneficial considerations that outweigh the adverse environmental impacts of removing the historic structures. The Board of Recreation and Park Commissioners and the City Council will make the final determination on the project, and provide findings accordingly. No other issues regarding the adequacy of the EIR are provided.
- V-3 Your opinion pointing out the distinction between the launching pad and the World War II gun emplacements, and the six former Nike military structures is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. Nonetheless, the removal of the six above-ground structures constitutes a significant impact, and these impacts must be considered by the decision makers along with public comments. No other issues regarding the adequacy of the EIR are provided.

August 9, 2001

David Attaway, Environmental Supervisor
City of Los Angeles Department of Recreation and Parks
200 N. Main Street, Room 709
City Hall East
Los Angeles, CA 90012

Re: Draft Environmental Impact Report for the White Point Nature Preserve

Dear Mr. Attaway,

We reside at 1471 Paseo Del Mar in San Pedro and live directly and diagonally across the street from the White Point Nature Preserve. We have been strong advocates for the creation of a perpetual nature preserve at White Point. We are very pleased with the progress that has been made to date in re-establishing and preserving this rare and precious property for the use and enjoyment of today's and future generations of nature lovers. The unselfish efforts of the Palos Verdes Land Conservancy and local citizens in cleaning, clearing and replanting the land for all to enjoy is a testimony to the dedication to and seriousness of their goal to preserve and protect this area. Among the many exceptional qualities and attributes associated with the establishment of this preserve are:

- It is located in the heart of an otherwise densely developed and populated city.
- It has been enthusiastically adopted by the residents and feeds the development of bonds and generosity toward the community.
- It is easily accessible by all.
- It easily presents visual access to natural beauty and preservation to those who pass by in their cars but don't stop at the preserve.
- It will become a living legacy of the natural habitat of Southern California's coastal territory.

W-1

This letter is to inform you that we strongly support the proposed project for the White Point Nature Preserve as described in the Draft EIR. We also request your support for certification of this draft. We do not support the alternatives presented in the Draft EIR. The above ground, abandoned buildings are dilapidated, unsightly, regularly sprayed with graffiti and attract activities that are not in the best interest of the community. Because of this, we request that these buildings be removed.

W-2

W-3

W-4

W-5

We formally request that we be notified of the public review scheduled for the EIR and hereby "contact the city" as required on page 1-4.

W-6

Thank you for your attention and support in this matter.



Deborah and Blaine Beron-Rawdon
1471 Paseo Del Mar
San Pedro, CA 90731

- W-1 Your comments and opinions regarding the qualities associated with the proposed nature preserve are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- W-2 Your comments in support of the proposed project as described in the Draft EIR are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- W-3 Your request in support of certification of the Draft EIR is acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- W-4 Your comment in opposition to the alternatives presented in the Draft EIR is acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- W-5 Your request to have the buildings removed and your opinions regarding the aesthetic and nuisance impacts of the existing buildings are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. Your opinions support the proposed project and are consistent with the project objectives stated in the Draft EIR. No other issues regarding the adequacy of the EIR are provided.
- W-6 Your formal request to be notified for public review is acknowledged. You will be added to the distribution list for all future notification regarding the proposed project.

BIESMAN-SIMONS ARCHITECTURE

August 13, 2001

Via Fax: (213) 617-0439

David Attaway, Environmental Supervisor
City of Los Angeles Department of Recreation and Parks
200 N. Main Street, Room 709
City Hall East
Los Angeles, CA 90012

Re: Draft Environmental Impact Report for the White Point Nature Preserve.

Dear Mr. Attaway,

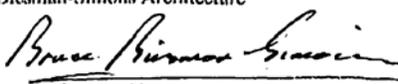
I strongly support the proposed project at White Point Nature Preserve as described in the Draft EIR. | X-1

The Palos Verdes Land Conservancy and the local neighbors have proven their commitment to the project as evidenced by the many, many hours that have been spent on the project to date. Together, we will develop a landmark project that will be an extraordinary cultural, physical and educational resource.

None of the Alternatives presented in the Draft EIR would be satisfactory. The removal of the remaining, above grade, abandoned buildings will contribute greatly to the overall appearance of the area. They are ugly, a public nuisance, and are a target for repeated vandalism and graffiti. | X-2
| X-3

I urge you to forward the Draft EIR to your Board for certification as is. | X-4

This letter is also my formal request to be notified of the public review schedule for the EIR. I am hereby "contacting the City" as required on page 1-4. | X-5

Biesman-Simons Architecture

Bruce Biesman-Simons, AIA

cc: Chad Beckstrom, Jones & Stokes (EIR Consultant) fax: (949) 260-1081
Loren DeRoy, Chair, White Point Nature Preserve Steering Committee fax: (310) 377-6627

- X-1 Your comment in favor of the proposed project as described in the Draft EIR is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- X-2 Your comment in opposition to the alternatives presented in the EIR is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- X-3 Your opinions regarding the aesthetic and nuisance impacts of removing the remaining former military structures are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- X-4 Your recommendation to certify the Draft EIR is acknowledged and as is will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- X-5 Your formal request to be notified for public review is acknowledged. You will be added to the distribution list for all future notification regarding the proposed project.

July 27, 2001

David Attaway, environmental supervisor
Los Angeles Department of Recreation and Parks
200 N. Main Street, Room 709
City Hall East, Los Angeles, CA 90013

Dear Mr. Attaway:

I am writing in regard to the plan for development of "White Point Nature Preserve" on the old military site. My son and I have enjoyed visiting the museum and seeing the old buildings there since he was little. We strongly support the alternative plan that would include preservation and restoration of all the buildings on site. They represent a unique portion of our history and need not be removed, as there is ample space for parkland on the site.

Y-1

Y-2

The sunken concrete missile launch area is particularly interesting, and should definitely be restored (all of it is closed off now and some seems to be used as storage for the LAUSD.) The tunnels would be fascinating if some of them could be opened partially. Also, the marine mammal rescue operation seems to be a compatible use of the space, a good cause and an interesting site for many people to visit.

Y-3

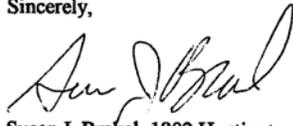
During my most recent extended walk around the site, this spring, I saw that some buildings were being used by the school district for adult job training and as an elementary school. Will those uses be continued? I think they should be. It certainly must be nice for school children to be surrounded by open space. However, as it is now, the school is in open but unmaintained surroundings. Some ugly bungalows serve as classrooms and it is apparent that little or no money has been invested in watering the soccer field adjacent to the school.

Y-4

I hope that the entire site can be made into a recreational area while restoring the old buildings and permitting the present compatible uses (school, job training, marine rescue, military history museum) to continue.

Y-5

Sincerely,



Susan J. Brackel 1802 Huntington Lane #3 Redondo Beach CA 90278
Cc: Daily Breeze (letter written in response to 7/23 article on p. B-1)

- Y-1 Your comments are acknowledged. However, it appears that the commenter may be referring to another location, possibly associated with Fort MacArthur. The White Point project site does not contain a museum and has been closed to formal public access since it was transferred to the City in 1978. No further response is required.
- Y-2 Your comment in support of the alternative plan and your opinion regarding the retention of the buildings are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. However, based on the other comments within the letter, it appears that the commenter is referring to another site possibly associated with Fort MacArthur, and not White Point park. No issues regarding the adequacy of the EIR are provided, and no further response is required.
- Y-3 It appears that the commenter may be referring to another site—not White Point. The underground Nike Missile magazine structures are not used for storage for LAUSD. Additionally, the site does not contain any tunnels that could be opened for the public, or a marine mammal rescue operation. No issues regarding the adequacy of the EIR are provided, and no further response is required.
- Y-4 It appears that the commenter may be referring to another site; not White Point. The site has been closed to public access and none of the buildings onsite have been used by the school district or any other organization. No further response is required.
- Y-5 It appears that the commenter may be referring to another site; not White Point. The site has been closed to public access and does not contain any of the present compatible uses that are identified (school, job training, marine rescue, military history museum). No further response is required.

FAXED TO JSA 8/13/01

PhoneTools



Phone: 310-547-3255

Fax: 310-547-0688

Message :

I am in complete support of the Palos Verdes Land Conservancy's plan for the White Point Nature Preserve. I walk on Paseo del Mar, and look forward to the planting and opening.

Holy Cain

52 Avenida Corona, Rancho Palos Verdes, CA 90275

email: billholly@msn.com

tele: (310)5473255

Z-1

From:

Bill Cain

To:

david attaway

Date: 8/10/01

Page(s): 1

Z-1 Your comments in support of the Palos Verdes Land Conservancy's plan for the White Point Nature Preserve are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

FAXED D.J.S.A 8/13/01

To: DAVID ATTAWAY
From: Douglas Epperhart
Re: White Point Park Draft EIR

Douglas Epperhart

1206 West 37th Street
San Pedro, California 90731-6012
Telephone: (310) 833-0253
E-mail: depperhart@aol.com

August 12, 2001

Mr. David Attaway, Environmental Supervisor
Los Angeles Department of Recreation and Parks
200 North Main Street, Room 709
Los Angeles, California 90012

Dear Mr. Attaway:

I am writing to comment on the White Point Park Nature Preserve Draft Environmental Impact Report. I support the city's proposal to develop the park as a nature preserve and remove the existing structures.

| AA-1

None of the draft EIR's alternative proposals offer a better solution, particularly in light of the fact that for more than 25 years, no maintenance has been performed on the existing buildings. Until the last year or so, no individual or organization has expressed any interest in preserving this site. The only group that ever cleaned up the site or painted out graffiti was the neighborhood association.

| AA-2

While historic preservation is a noble idea, the practical reality is that only a handful of individuals has pursued the goal of preserving the Nike missile structures and they do not have the resources to maintain the structures as they now are, let alone perform the necessary restoration. If the buildings are allowed to remain, they will continue to decay.

| AA-3

I urge that this draft EIR be sent to the Board of Recreation and Parks Commissioners with a recommendation to accept the city's original proposal.

| AA-4

I also request that I be notified of further developments regarding this draft EIR.

| AA-5

Sincerely,



Douglas Epperhart

- AA-1 Your comments in support of the City's proposal to develop the park as a nature preserve and removal of the existing structures are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- AA-2 Your comments in opposition to the alternatives presented in the Draft EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. The Department also acknowledges your concern regarding the historical neglected maintenance onsite and the neighborhood's involvement in cleaning up the site. No other issues regarding the adequacy of the EIR are provided.
- AA-3 Your opinion regarding the historic preservation of the buildings onsite and the continued decay if they remain is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. It should be noted that no specific proposals for the restoration and maintenance of these structures has been approved. To date, neither the Department, nor any other group, has applied for, or received funding for the preservation of the buildings. However, it should be noted that funding sources may be available (as pointed out in other comment letters by the State Office of Historic Preservation, the Los Angeles Conservancy, and the Fort MacArthur Museum Association, and the Los Angeles Nike Air Defense Veteran's Association) for the rehabilitation of the structures if the decision makers choose to adopt one of the alternatives. The statement regarding the continued decay of the buildings if they are allowed to remain is highly speculative. No other issues regarding the adequacy of the EIR are provided.
- AA-4 Your comment regarding submittal of the Draft EIR to the Board of Recreation and Park Commissioners with a recommendation to accept the city's original proposal is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- AA-5 Your formal request to be notified for public review is acknowledged. You will be added to the distribution list for all future notification regarding the proposed project.

Mr. David Attaway
Environmental Supervisor
Los Angeles Department of Recreation and Parks
200. N. Main Street, Room 709
City Hall East
Los Angeles, CA 90012

August 3, 2001

Dear Mr. Attaway:

I have reviewed the Environmental Impact Report as presented by Jones & Stokes and I support of the findings which are in agreement with the Master Plan for the White Point Nature Preserve.

BB-1

I feel strongly that the interpretation of the history of the property will be adequately addressed and mitigated as proposed by the Master Plan for the White Point Nature Preserve.

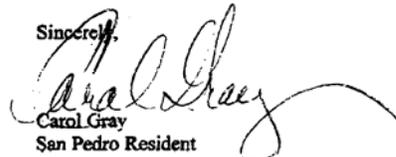
BB-2

The White Point Nature Preserve has been the dream of our San Pedro community for over two decades.

BB-3

I am anxiously anticipating the completion of the EIR process and implementation of the Master Plan for the White Point Nature Preserve.

Sincerely,



Carol Gray
San Pedro Resident
2230 Mt. Shasta Dr.
San Pedro, CA 90732

- BB-1 Your comment in support of the findings of the EIR is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. It should be clarified that the findings are not necessarily in agreement with the Master Plan for the White Point Nature Preserve. Jones & Stokes was retained as an independent consultant to conduct an objective review analysis of the environmental impacts of the project. Some of the conclusions in the EIR indicate that the proposed project could result in a significant impact. No other issues regarding the adequacy of the EIR are provided.
- BB-2 Your opinion suggesting that the interpretation of the history of the property will be adequately addressed and mitigated as proposed by the Master Plan for the White Point Nature Preserve is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. While mitigation measures are incorporated that would provide interpretation of the historical resources and reduce the impacts, it should be noted that the removal of the former Nike military structures would result in significant impacts as defined under CEQA. No other issues regarding the adequacy of the EIR are provided.
- BB-3 Your comment is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.

Milton W. Heyne
2184 Paseo del Mar
San Pedro, CA 90732

Phone: 310-547-0120

8
August, 2001

Mr. David Attaway, Environmental Supervisor
Recreation & Parks Dept., City of Los Angeles
200 N. Main Street, Room 709 CHE
Los Angeles, CA 90012

Subject: Draft EIR for the White Point Nature Preserve

Dear Mr. Attaway:

In reviewing your draft Environmental Impact Report (EIR) I strongly support alternate number 3. The body of the draft report calls for the demolition of all historic above ground Nike missile structures. In effect, this leaves no above ground reminders that any Nike activities existed there at all. As your report fairly points out these buildings are listed in the California Register of Historical Resources as contributing to a significant Historic District. That "Historic District" status must be preserved.

CC-1

The two main structures near each other in their current shell form are readily adaptable to reuse. Either or both could well serve as the beginning of an interpretive center that would remind us of the cultural resources and historic sites that exist on the property, San Pedro's first seafood (abalone) processing activity, the Sepulveda homestead, the home sites of Japanese-American farmers, the existing palm and olive picnic groves planted by Roman Sepulveda and, of course, the Cold War significance of the Nike program itself.

CC-2

I believe the earlier process used for determining the sentiments of the surrounding community was flawed. We can talk about that if you desire.

CC-3

I am pleased that your draft identified alternate 3 as an environmentally superior alternative. It would include both cosmetic and structural upgrades of the existing structures to accommodate future reuse of the facilities into the park. Alternate 3 contains the changes I request.

CC-4

Thank you for soliciting public comments.

Yours very truly,


Milton W. Heyne

- CC-1 Your comments in support of Alternative 3 as outlined in the Draft EIR is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. However, it should be noted that the Nike Missile launch pad facility, which is above ground, and the underground storage magazines would be preserved as part of the proposed project that is analyzed in the EIR. No other issues regarding the adequacy of the EIR are provided.
- CC-2 Your comments suggesting that the two main structures near each other (presumably the commenter is referring to the Nike Missile Assembly and Service Building and the Warhead Assembly Building) be retained for adaptive reuse as an interpretive center, are acknowledged. While this may be possible, there are no specific plans to reuse these buildings at this time, and the proposed project includes removal of these structures. Alternative 3 also does not specifically call for adaptive reuse, but it offers flexibility and this could be one option to consider under this alternative. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- CC-3 It is unclear what "process for determining the sentiments of the surrounding community" the commenter is referring to as being flawed. Community outreach and participation was conducted by the PVPLC and the Steering Committee prior to initiation of the CEQA process. The public notification and review procedures were adequate and included surrounding residents and responsible agencies, as well as a 30-day public review period to determine the appropriate scope of the EIR. The Draft EIR was then released for a 45-day public review period, in which comments were received. The EIR is an objective analysis of the environmental impacts of the project and is not intended to consider the emotional sentiments of the community. The CEQA process was initiated after a "proposed project" was developed by the Department and the PVPLC. No additional issues regarding the adequacy of the EIR are provided.
- CC-4 Your comments in support of Alternative 3 containing the changes that you request and as being identified as the Environmentally Superior Alternative are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

Date: August 5, 2001

From: Barry Holchin
Conservation Chair
Palos Verdes – South Bay Group
Angeles Chapter, Sierra Club

To: Mr. David Attaway
Environmental Supervisor
L.A. Dept. of Recreation and Parks
200 N. Main Street, Room 709 CHE
Los Angeles, CA 90012

Subject: Draft EIR for the White Point Nature Preserve

The PV/SB Sierra Club Group, representing 4700 members in the South Bay area, is strongly in favor of the proposed project as planned. The draft EIR provides an objective review of the Project Background and Objectives, the Location and Settings of the Proposed Project --- including Visitors Services, Habitat Restoration and retention of the WWII Paul D. Bunker Battery, and retention of the underground Nike Magazines and Elevators. | DD-1
| DD-2

It rightly calls for removal of the six temporary above-ground 50 year old vandalized wood framed structures. If not removed, these derelict eyesores will seriously detract from the peaceful ambiance of the Nature Preserve. The two upper side hill Paul D. Bunker Coast Artillery structures, and the underground Nike Magazines, should and will give appropriate recognition to the past military uses. | DD-3
| DD-4

It is the position of the PV-SB Group of the Sierra Club that the project as characterized above represents the best use of the White Point site. | DD-5



Barry W. Holchin

- DD-1 Your comment indicating the support of the proposed project by the PV/SB Sierra Club Group is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- DD-2 Thank you for your comments regarding the objective review of the project background and objectives, the location and settings of the proposed project presented in the EIR. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are presented.
- DD-3 Your opinion regarding the aesthetic impacts of retaining the former military structures is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. However, in order to clarify, it should be noted that these structures are not "temporary" and only the Ready Room is wood framed. The other structures are constructed with masonry materials. No other issues regarding the adequacy of the EIR are presented.
- DD-4 Your opinion regarding the appropriate recognition of the past military uses of the Battery Paul D. Bunker and the Nike Missile underground storage magazine is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. However, it should be noted that the removal of the former military structures is considered a significant impact under CEQA. No issues regarding the adequacy of the EIR are provided.
- DD-5 Your comment indicating the position of the PV/SB Sierra Club Group is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.

Aug 10 01 06:09p

James G. Holwerda

310 547 4955

p. 1

FAXED TO ISA 8/12/01

August 7, 2001

Via Fax: (213) 617-0439

David Attaway, Environmental Supervisor
City of Los Angeles Department of Recreation and Parks
200 N. Main Street, Room 709
City Hall East
Los Angeles, CA 90012

Re: Draft Environmental Impact Report for the White Point Nature Preserve.

Dear Mr. Attaway,

I strongly support the proposed project at White Point Nature Preserve as described in the Draft EIR. | EE-1

The Palos Verdes Land Conservancy and the local neighbors have proven their commitment to the project as evidenced by the many, many hours that have been spent on the project to date. Together, we will develop a landmark project that will be an extraordinary cultural, physical and educational resource. | EE-2

None of the Alternatives presented in the Draft EIR would be satisfactory. The removal of the remaining, above grade, abandoned buildings will contribute greatly to the overall appearance of the area. They are ugly, a public nuisance, and are a target for repeated vandalism and graffiti. | EE-3
| EE-4

I urge you to forward the Draft EIR to your Board for certification as is. | EE-5

This letter is also my formal request to be notified of the public review schedule for the EIR. I am hereby "contacting the City" as required on page 1-4. | EE-6

Sincerely,

James G. Holwerda

1217th Paseo Del Mar
San Pedro Ca 90731

- EE-1 Your comments in support of the proposed project at White Point as described in the Draft EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- EE-2 This comment expresses the opinion of the commenter in support of the overall objectives of the proposed project. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- EE-3 Your comments in opposition to the Alternatives presented in the Draft EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- EE-4 Your opinion regarding the aesthetic impacts of removal of the remaining military structures is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- EE-5 Your request to forward the Draft EIR to the Board for certification is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- EE-6 Your formal request to be notified for public review is acknowledged. You will be added to the distribution list for all future notification regarding the proposed project.

FROM : MARINKOVICH

PHONE NO. : 3108327869

Aug. 07 2001 01:28AM P2

Mr. David Attaway
Environmental Supervisor
Los Angeles Department of Recreation and Parks
200. N. Main St., Room 709
City Hall East
Los Angeles, CA 90012

August 4, 2001

Dear Mr. Attaway:

I have reviewed the Environmental Impact Report as presented by Jones & Stokes and I am in support of the findings that are in agreement with the Master Plan for the White Point Nature Preserve.

FF-1

I served this country at this site during the Vietnam Era. I totally support the Master Plan for the White Point Nature Preserve. Anyone and everyone will be able to enjoy this coast that we served to protect. I do not believe we need to memorialize the old buildings.

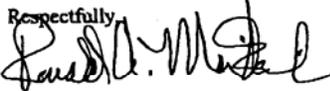
FF-2

FF-3

I feel strongly that the interpretation of the history of the property will be adequately addressed and mitigated as proposed in the Master Plan for the White Point Nature Preserve.

FF-4

I am anxiously anticipating the completion of the EIR process and implementation of the Master Plan for the White Point Nature Preserve.

Respectfully


Ronald A. Marinkovich

- FF-1 Your comments in support of the findings of the Draft EIR and in agreement with the Master Plan for White Point Nature Preserve are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- FF-2 Your service at the site during the Vietnam Era is recognized and your comments in support of the Master Plan for White Point Nature Preserve are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- FF-3 Your opinions in opposition to memorializing the old buildings are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- FF-4 Your opinions that the interpretation of history of the site would be adequately addressed through the Master Plan for the White Point Nature Preserve are acknowledged. However, there are currently no specific details regarding the historic interpretation of the site. As a concept, an interpretive program to address several phases of history of the site, including the Nike Missile program, would be implemented onsite. Your comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

.....

JOHN G. MILLER, M.D., FACEP

*Diplomate: American Board
of Emergency Medicine*

**1479 Paseo Del Mar
San Pedro, CA 90731
(310) 548-4420**

August 8, 2001

David Attaway, Environmental Supervisor
City of Los Angeles Department of Recreation and Parks
200 N. Main Street, Room 709
City Hall East
Los Angeles, CA 90012

Dear Sir,

I am in complete support of the proposed White Point Nature Preserve project as described in the current draft EIR. This is a fantastic preservation effort and I am grateful for the efforts of all of those who have participated, especially the Palos Verdes Land Conservancy and the community citizens.

| GG-1

This project will enhance and preserve our ever shrinking natural habitat and provide the open space absolutely necessary for the mental health of our communities.

| GG-2

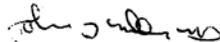
The alternatives proposed in the EIR report are unacceptable. I also strongly request the rapid removal of the deteriorating and unsightly structures currently on this site. They are a hazard and encourage vandalism.

| GG-3
| GG-4

Please support the current Draft EIR.

| GG-5

Sincerely,


John Miller, MD

.....

- GG-1 Your comments in support of the proposed project as presented in the EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- GG-2 Your opinions regarding the enhancement and preservation of the natural habitat and open space are consistent with the overall project objectives and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- GG-3 Your comments in opposition to the Alternatives presented in the EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- GG-4 Your request to remove the former military structures is consistent with the proposed project and the overall project objectives. Additionally, your opinions regarding the hazards and vandalism encouraged by the remaining buildings are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- GG-5 Your comments in support of the current Draft EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

August 8, 2001

David Attaway, Environmental Supervisor
City of Los Angeles Department of Recreation and Parks
200 N. Main Street, Room 709
City Hall East
Los Angeles, CA 90012

Re: Draft Environmental Impact Report for the White Point Nature Preserve

Dear Mr. Attaway,

Thank you for honoring my request and mailing me the White Point Nature Preserve EIR report in its entirety. I was impressed with the thoroughness of the report and greatly appreciate all the hard work that went into this draft report.

HH-1

I wish to convey to you my strongest support for the proposed project at the White Point Nature Preserve as described in the EIR! We are very proud of all the community support, volunteer hours and participation of all our neighbors. We are exceptionally grateful to the Palos Verdes Land Conservancy for their commitment and expert ability to coordinate all the efforts necessary for this project.

HH-2

I believe it is integral that the old, dangerous and dilapidated buildings on this site be removed in their entirety, not only for aesthetic purposes but more importantly for safety. They are a severe eye sore and create an appearance of an unkempt neighborhood, inviting graffiti and other unsavory activities.

HH-3

Please support the Draft EIR for certification. I object to the proposed alternatives and request you do all you can to have your Board certify the Draft EIR as is.

HH-4

If you have any questions, please feel free to call me at (310) 548-4420.

Very truly yours,

Theresa J. Miller



- HH-1 Thank you for your comments on the thoroughness of the Draft EIR and acknowledgement of the hard work that went into the report. No other issues regarding the adequacy of the EIR are provided.
- HH-2 Your comments in support of the proposed project as described in the EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- HH-3 Your comments and opinions regarding the aesthetic and safety issues associated with the former military structures, as well as your request that they be removed are acknowledged. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- HH-4 Your comments in support of certifying the EIR and in opposition to the alternatives are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

Elsa L. Morris
Attorney at Law
3706 S. Weymouth Avenue
San Pedro, California 90731
(310) 832-6461

August 8, 2001

Via Facsimile & US Mail
(213) 617-0439

David Attaway, Environmental Supervisor
City of Los Angeles, Department of Recreation and Parks
200 N. Main St., Rm 709, 7th Floor
City Hall East
Los Angeles, CA 90012

Re: Draft Environmental Impact Report [DEIR]
White Point Nature Preserve Master Plan

Dear Mr. Attaway:

I have reviewed the Executive Summary portion of the above-referenced DEIR. I support the project as proposed. The DEIR indicates that Alternative 3 is considered the environmentally superior alternative to the proposed project in that the only non-mitigable impacts of the project identified, being removal and/or destruction of a portion of the military historic resources, would be avoided. However, when comparing the dilapidated condition of the former military structures involved and the costs to restore them with the benefits of a nature preserve with widespread community support it would appear that the project as proposed is, in fact, environmentally superior to any of the alternatives. In any event, the appropriate overriding social and economic findings can be made to justify approval of the project as proposed even though there may be non-mitigable significant impacts.

II-1

II-2

II-3

As indicated by me previously, it would appear that the most significant impact of the project is that it will **improve the environment rather than adversely impact it**. It would appear that the beneficial environmental impacts of the project, while not required to be set forth in the DEIR by CEQA, should, nonetheless, be identified in the DEIR in order that the decision makers and the public are made aware of the significance of wildlife habitat restoration to the environment when considering the approval of the project as proposed.

II-4

Very truly yours,



ELSA L. MORRIS

- II-1 Your comment in support of the project as proposed is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- II-2 As the commenter points out, the Draft EIR recognizes Alternative 3 as the environmentally superior alternative because it is the only alternative that fully eliminates significant impacts associated with removal of the historical resources onsite. While it is recognized that this may not be considered the most "superior" or accepted alternative to the local community, from an environmental perspective it is considered the most environmentally superior alternative when evaluated in accordance with the CEQA Guidelines. CEQA requires that only physical impacts to the environment be considered, and does not take into account cost of restoration, or political acceptance. This is left to the decision makers during the Findings and deliberations on the project.
- II-3 As the commenter accurately points out, CEQA enables the decision makers to find that overriding social and economic considerations justify approval of the proposed project in light of the significant unavoidable impacts. Additionally, legal, technological, and any other considerations may be identified to justify approval of the project as proposed.
- II-4 The comment suggesting that the project would improve the environment rather than adversely impact it is acknowledged. The Draft EIR does in fact conclude that the proposed project will result in beneficial impacts to biological resources as a result of the proposed restoration and preservation efforts (See Chapter 3B, "Biological Resources"). Nonetheless, the adverse impacts of the project must also be disclosed as required by the CEQA Statutes and Guidelines. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

Rodger D. Paige
1442 W. Hamilton Ave.
San Pedro, Ca. 90731

August 9, 2001

Mr. David Attaway
Environmental Supervisor
Department of Recreation and Parks
200 North Main St., Room 709
Los Angeles, Ca. 90012

Dear Mr. Attaway:

I am writing in response to the draft EIR for the proposed White Point Park Nature Preserve Master Plan.

I am fully in agreement with the plan as written. My purpose in writing to you is to stress my concern for the possibility of not removing the on-site buildings. These structures have for years been a source of concern for the local residents. They have been vandalized beyond any practical use, and require frequent graffiti removal. Many Saturday work parties by residents in the area, and others, have been assembled over the years to repaint the buildings and remove graffiti. At this stage, they serve little practical use to the community, and there is no known source of funds to rehabilitate them. If the Historical Society wants a presence in the nature preserve, there is ample opportunity in developing the history of the area using the remains of the Sepulveda family residence, Indian artifacts, WW II bunkers, and the Nike Missile launch site.

JJ-1
JJ-2
JJ-3
JJ-4

Thanks for your consideration.

Very truly yours,



Rodger D. Paige

AG 11/1
69

- JJ-1 Your comment in favor of the plan as written is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- JJ-2 Your concerns regarding the possible retention of the on-site buildings and the ongoing source of concern by the local residents are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- JJ-3 Your opinion regarding the use of the existing buildings is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. Additionally, the statement suggesting that no known source of funds has been identified to rehabilitate the existing former military structures is acknowledged. To date, neither the Department, nor any other group, has applied for, or received funding for the preservation of the buildings. However, it should be noted that funding sources may be available (as pointed out in other comment letters by the State Office of Historic Preservation, the Los Angeles Conservancy, and the Fort MacArthur Museum Association, and the Los Angeles Nike Air Defense Veteran's Association) for the rehabilitation of the structures if the decision makers choose to adopt one of the alternatives. No issues regarding the adequacy of the EIR are provided.
- JJ-4 Your opinion regarding the opportunity for the Historical Society to have a presence within the nature preserve with the remains of the Sepulveda family residence, Indian artifacts, WW II bunkers, and the Nike Missile launch site are acknowledged and will be forwarded on to the decision makers. Mitigation measures have been incorporated into the proposed project, which provide an historical interpretive element to White Point Park that will include the above-mentioned historical elements of the site. However, the details of any interpretive program have not yet been established. It should also be noted, that the EIR acknowledges that the removal of the former Nike military structures constitutes a significant impact under CEQA. No issues regarding the adequacy of the EIR are provided.

Noel Park
3233 S. Walker Ave., San Pedro, CA 90731
(310) 832-5720 home (562) 804-5205 business (562) 804-5210 fax
August 4, 2001

Mr. David Attaway, Environmental Supervisor
City of Los Angeles, Department of Recreation and Parks
200 N. Main St., Room 709 CHE
Los Angeles, CA 90012

By mail and fax to: (213) 617-0439

Reference: Draft Environmental Impact Report, White Point Park Nature Preserve

Dear Mr. Attaway:

Thank you for this thoughtful and complete Draft Environmental Impact Report (DEIR). I am in full and complete agreement with the project as proposed. I believe that this project, as outlined in the DEIR, will be a stunning environmental enhancement to our community, and, indeed, a wonderful resource for all of the residents of Los Angeles.

KK-1

I have participated in the preliminary clearing of invasive plants, and the planting of the small native plant demonstration plots on the property. As the coastal sage scrub plants have grown, and bloomed in the spring, I have been totally amazed by what I have seen. As a 55 year resident of the coastal area of Los Angeles, and a 32 year resident of the immediate neighborhood of White Point Park, I had never seen such a thing. As the coastal sage scrub habitat has been almost completely wiped out in southern California, people have lost the knowledge of what it looks like. I believe that, when this property is restored, its blooming season will rival the poppy fields in Antelope Valley as a public attraction.

KK-2

We are now beginning to see the potential of this project as an educational resource. The Palos Verdes Peninsula Land Conservancy has recently extended its educational program of classroom instruction and field trips to White Point School in San Pedro. All reports are that it has been a huge hit with students, faculty, and parents.

I am opposed to each of the five alternatives presented. As the nature preserve idea has captured the imagination of the local neighborhoods, and generated substantial potential grant resources (over \$1,000,000 at the last reading), Alternatives 1 and 4 are simply not applicable. Alternatives 2 or 3 would have the end results of preserving an ongoing nuisance and blight in our neighborhood, against which we have fought for years. They are, in my opinion, incompatible with the concept of a nature preserve.

KK-3

KK-4

As a member of the local residents association, I have been active for several years in the struggle to have the derelict buildings on the site removed. Our attention was intensely focused on this issue a few years ago when a 15 year old girl was raped and murdered in a similar abandoned building at Angels Gate Park, approximately a mile away. The same thing can happen here, and we will do anything in our power to prevent it. These buildings have historically been a magnet for vandalism and graffiti, and a haunt of transients and mischief making young people. I am enclosing a photograph of the last graffiti display, which was

KK-5

painted out by a cooperative effort of our residents and the Department of Recreation and Parks. History shows that it will return.

These ugly, vandalized, dangerous, nuisance buildings have blighted our neighborhood for many years. Volunteers have donated well over 4000 hours of labor to the habitat restoration effort to date. They have raised more than \$20,000 in grants and gifts for the beautification of the park. Those who advocate the leaving in place of the buildings have done nothing. We see no evidence that the Department has resources available to restore these buildings. Therefore, we believe that either Alternative 2 or Alternative 3 would have the practical effect of dooming us to suffer with this attractive nuisance forever. The record will show that the Department of Recreation and Parks has been clearly and repeatedly placed on notice of this attractive nuisance, and of their clear liability for any injury to the public resulting therefrom.

KK-6

KK-7

KK-8

In what we believe to be the highly unlikely event that Alternative 3 was implemented, and the buildings partially restored, we believe that a jarringly incompatible land use would be created. As we envision this stunningly restored nature preserve, the thought of these ugly Cold War era cinder block buildings sprouting in the midst of the restored coastal sage scrub habitat seems terribly inappropriate. Many of us who live around the property would prefer not to have these ugly reminders of the site's exploitation by the military industrial complex thrust into our lives every day. This feeling has been strongly reinforced lately by our learning that the last generation missiles at this site were designed for nuclear warheads. No one ever bothered to tell us about that.

KK-9

KK-10

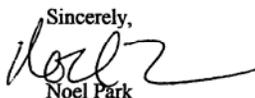
This site is being restored to a point in time long before the arrival of the missiles. I believe that the intent is to restore it to a point in time before the arrival of European settlers, whose cattle played the key role in the destruction of the coastal sage scrub habitat over 100 years ago. The intrusion of these buildings into this restoration, whether they continue derelict or are partially restored, will severely damage the ambiance of the site. Furthermore, many other passages of history will be interpreted on the site. These include, but are not limited to, the Native American use of the site, the Californios' use of the site, the Japanese-American community's farming and other uses of the site, and the earlier military technology of the artillery bunkers. I fail to see why this more recent military use of the site should take precedence in interpretation over these earlier, and arguably more significant, uses. I would like to see at least this one piece of property try to show the condition of the land before the impacts of modern man, who degraded it to its present sorry condition, and to keep the intrusions of modern military technology to a minimum. As a simple private citizen, I believe that the environment would be better served by the project as proposed than by any of the Alternatives presented.

KK-11

KK-12

Thank you again for this complete and responsive DEIR. I strongly urge you to go forward with the project as proposed. I am thrilled with the prospect of going ahead with this work. I believe that the combination of the awesome environmental enhancement which will result, and the highly innovative public-private partnership set up to achieve it, will create a triumph for all concerned.

KK-13

Sincerely,

Noel Park

DERELICT BUILDINGS
WHITE POINT PARK
SAN PEDRO. CA



- KK-1 Thank you for your comments regarding the thoughtful and completed Draft EIR. Your comment in agreement with the project as it is proposed, and your opinion regarding the results of the project are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- KK-2 Your opinion regarding the restoration of the property is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- KK-3 Your comment in opposition to the alternatives presented in the EIR is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- KK-4 Your opinions regarding the preservation of a nuisance by retaining the former military structures, and your opinions regarding the incompatibility of retaining these structures with the nature preserve, are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. However, this is speculative as implementation of the alternatives could potentially enhance the character of the buildings and enable adaptive reuse of these structures as part of the nature preserve. No other issues regarding the adequacy of the EIR are provided.
- KK-5 Your comment regarding the removal of the buildings and the history of problems associated with these buildings is acknowledged. The enclosed photographs are also recognized and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- KK-6 Your comments regarding the former military structures is acknowledged and the Department recognizes the volunteer efforts on the site to date. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- KK-7 Your opinions regarding Alternatives 2 and 3 are acknowledged. While it is true that the Department does not currently have the resources available to restore the buildings, and no specific proposals have been approved for the maintenance or restoration of these structures, it is possible that funding sources may be available (as pointed out in other comment letters by the State Office of Historic Preservation, the Los Angeles Conservancy, and the Fort MacArthur Museum Association, and the Los Angeles Nike Air Defense Veteran's Association) for the rehabilitation of the structures, if the decision makers choose to adopt one of the alternatives. The statement regarding the perpetual doom that would be suffered by the nearby residents, if the buildings were allowed to remain, is highly speculative. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

- KK-8 The Department acknowledges the concerns of the surrounding residents and has established the project objectives and moved forward with the proposed project accordingly. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- KK-9 Your opinion on the land use incompatibility that could potentially result from the implementation of Alternative 3 is acknowledged and will be forwarded on to the decision makers. However these comments are highly speculative and the characterization of the Cold War era cinder block buildings as "ugly" is subjective. Alternative 3 provides sufficient flexibility to enable the restoration and adaptive reuse of the buildings as components of the nature preserve. These buildings could be upgraded and enhanced to blend into the landscape, and could potentially provide a valuable contribution to the nature preserve in the future. These buildings are not of sufficient magnitude to significantly detract from the implementation of a nature preserve on the site. These comments will be considered by the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- KK-10 Your comments and opinions regarding the removal of the former military structures is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- KK-11 Your comments regarding the restoration of the site to a point in time before the arrival of the missiles is acknowledged. However, it should be noted that the recent military use of the site is not taking precedents over interpretation of other points in history, and your opinion as to other uses being more significant than the Nike Missile program is highly subjective. As stated previously, there have been no specific plans approved for historic restoration and interpretation. However, as you point out, there is ample opportunity for the interpretation of historic uses of the site dating back in prehistory to the Native American inhabitation of the site, up to the most recent historic use of the property. The fact is, the former military structures currently remain onsite and did in fact play a significant role in history with respect to the Los Angeles air and harbor military defense system. These structures are designated as significant resources on the California Register of Historic Resources, which affords the structures some added consideration prior to removal. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- KK-12 Your comments in support of the proposed project and in opposition to the Alternatives presented in the EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

KK-13 Your request to go forward with the project as proposed is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

FAKED TO USA 8/13/01

August 12, 2001

Via FAX : (213) 6170439

David Attaway
Environmental supervisor
City of Los Angeles, Department of Recreation and Parks
200 N. Main Street, Room 709, 7th Floor\City Hall East
Los Angeles, California 90012.

Re: Draft Environmental Impact Report (DEIR)
White Point Nature Preserve Master Plan

Dear Mr. Attaway:

We wish to express our **strong approval** and support of the project as proposed. We have just returned from vacation today and were very upset to see yet another act of graffiti on the building called the Ready Room. Please act quickly and move forward on implementation of the White Point Nature Preserve Master Plan.

LL-1

Sincerely,



Russell and Christina Parkison
1462 West 37th Street
San Pedro, CA 90731 (310) 831-9809

Response to Comments

White Point Park Nature Preserve
September 2001

LL-1 Your comments expressing strong approval and support of the project as proposed are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

Sent By: ;

310 831 4333;

Aug-10-01 12:20PM;

Page 1/2

RAVEN DUSA 8/10/01

Beth K. Sohngen
3722 Weymouth Avenue
San Pedro, CA 90731
(310) 832-2074

August 9, 2001

Mr. David Attaway, Environmental Supervisor
City of Los Angeles, Department of Recreational Parks
200 N. Main Street, Room 709
City Hall East
Los Angeles, CA 90012
FAX # 213 617-0439

Re: Draft Environmental Impact Report for the
White Point Nature Preserve Master Plan

Dear Mr. Attaway,

I have thoroughly reviewed the Draft Environmental Impact Report prepared by the Jones and Stokes Company, and fully support all of the goals and objectives for the project as are outlined on page three of the Executive Summary. The implementation of the Master Plan for the White Point Nature Preserve will provide wonderful educational opportunities for students throughout our city, as well as restoring the ecological value of the land to provide for native habitat and plant communities. By preserving and restoring this natural resource, all of us will benefit.

MM-1

MM-2

As a Palos Verdes Peninsula Land Conservancy docent, I recently had the opportunity to introduce the 3rd grade Naturalist Program to the students at White Point Elementary School. I made several visits to the 3rd grade classrooms and made presentations on the history, geology, flora and fauna of the Peninsula, emphasizing the biome of the White Point site. The program culminated with an educational nature walk through the property that was assisted by many parent volunteers. This is the type of wonderful program that thousands of Los Angeles students will benefit from at the future White Point Nature Preserve.

I strongly favor the removal of the existing vandalized structures on the property and believe that the military history of the property will be respectfully and adequately interpreted as is detailed in the DEIR. It should be noted by everyone that the Master Plan DOES call for the preservation of the Nike Missile launch facility and underground storage magazines, as well as the Battery Paul D. Bunker, which will remain on the Nature Preserve forever as a testament to the significance of this land to the defense of our country during the 32 years the U.S. military occupied and controlled the property. However, the above ground buildings clearly were not constructed or intended to last forever, and as neighbors who have to look at them across the street every day, my

MM-3

MM-4

MM-5

husband and I consider them to be attractive nuisances that the city should remove immediately.

My family has participated in most of the monthly volunteer workdays at the park and can attest to the widespread community support for the project. We are eagerly anticipating the approval of the DEIR so that the city can move forward on implementing the Master Plan for the White Point Nature Preserve.

MM-6

The members of this community will be forever grateful for the visionary actions taken by the Department of Recreation and Parks in establishing this natural gem along our coastline.

Sincerely,


Beth K. Sohngen

- MM-1 Your comments in support of the goals and objectives of the project as outlined in the EIR are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- MM-2 Your opinions regarding the implementation of the Master Plan for the White Point Nature Preserve are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- MM-3 Your comments in favor of removing the existing vandalized structures, and your opinion regarding the interpretation of the military history of the property are acknowledged. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- MM-4 This comment restates the project components, which include preservation of the Nike Missile launch facility and underground magazines and the Battery Paul D. Bunker. The commenter also expresses the opinion that the retention of these structures will serve as a testament of the significance in defense of the country during the military control of the property. No other issues regarding the adequacy of the EIR are provided.
- MM-5 The comment expresses the opinion that the above-ground buildings were not constructed or intended to last forever, and that they are attractive nuisances that should be removed. It should be noted that the buildings are not "temporary" structures and it is speculative to assume the life expectancy of the buildings. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- MM-6 The comment expresses the opinion of widespread community support for the project. These comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

Sally F. Strehlke
669 W. 36 Street, #2
San Pedro, California 90731-7605

July 25, 2001

Mr. David Attaway
Environmental Supervisor
Los Angeles Department of Recreation and Parks
200 North Main Street, #709 CHE
Los Angeles, CA 90012

Dear Mr. Attaway:

The article "White Point at Crossroads" published in the *Daily Breeze* on Monday, July 23, 2001, is of great interest to me. Living near Angels Gate Park and the White Point nature preserve, I have led groups of friends and relatives on personal tours as well as enjoyed the area myself.

To have a complex that is a combination of history and magnificent nature is almost unbelievable in this day and age. If the remaining buildings of World War II vintage can be restored to complement the Fort MacArthur Museum and the Nike Missile era, I think would be terrific. These building improvements, together with the nature preserve, would make this whole hill area an unbelievable public attraction.

NN-1

San Pedro is said to be one of Los Angeles' best kept secrets. But with all of its history and beauty, San Pedro should be one of Los Angeles' stars. I hope that you will see that history is preserved and that the Palos Verdes Peninsula Land Conservancy can continue its work on the White Point nature preserve.

NN-2

Sincerely,


Sally F. Strehlke

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August 2, 2001

From: Lawrence D. Vivian PE, MBA
2324 West 37th Street
San Pedro, CA 90732

To: David Attaway
Environmental Supervisor
L.A. Dept. of Recreation and Parks
200 North Main Street, Room 709 CHE
Los Angeles, CA 90012

Dear Mr. Attaway,

I am writing this letter of review as a concerned citizen and "neighbor" to the White Point Nature Preserve ... living some 3 blocks away from the site to the North.

Let me begin by stating what I am not. I am not an Anti-Military Pro-Environmental Radical. I am a Veteran of WWII, a Registered Engineer (M-16541) who has spent 41 years working for the Department of Defense ... 14 of which were in Germany (from 1952 to 1967) for the Corps of Engineers ... supervising the construction of major military facilities in support of our Country's Cold War Efforts! (One project of which was an actual Nike site). The next 27 years I worked for the U.S. Navy Dept. at the Long Beach Naval Shipyard (here in the L.A. Harbor) in responsible engineering positions ... ending my Civil Service Career as the Chief Industrial Engineer for the Shipyard. So, I speak as a professional, rational individual, a Veteran and one who has personally supported our Nation's Military Efforts with over 41 years dedicated to Civil Service and the Military.

OO-1

I am further the past Conservation Chairman for the Palos Verdes/South Bay Sierra Club, and have serious concerns regarding remaining "Open Space" and Parkland ... for ourselves and the coming generations. I personally attended the State Historical Resources Commission meeting in San Luis Obispo in August of 2000, as the local Sierra Club Representative ... at my own expense. After I had testified and it was decided by the Commission that White Point should be officially recognized as a "Historical Site", I was approached by one of the Commission Members. He told me that it was his and the Commission's opinion that the White Point Site could be considered a Historical Site and be developed as an effective Nature Preserve as well ... the two were not incompatible! So then, the question remains is not "if" but "what"?

OO-2

The Palos Verdes Peninsula Land Conservancy (PVPLC) has spent untold hours of planning and effort ... with their own funds and volunteer labor ... and has a good start already preparing the site to be an impressive Nature Preserve! On the other hand, the Ex-Military Personnel connected with the Ft. MacArthur Military Museum have, to the best of my knowledge, done little or nothing concrete, nor have they indicated how they would propose that the former Nike Site be restored, funded, staffed and operated, were the old Nike Site to be restored. (If the Ft. MacArthur Military Museum itself is any indication ... it is housed in the old concrete WWI underground Osgood/Farley Coastal Artillery Bunkers, at Pt. Fermin. It is only open from 12 to 5 pm on Saturdays and

OO-3

OO-4

Sundays ... and appears manned by two volunteers). To restore the former Nike Site to anything meaningful would take many thousands of dollars ... and would require a huge effort by many dedicated people. Where would all these people and funds come from?

OO-4
cont'd

Currently, the remaining 3 Guard Shacks and former barracks-type temporary building are dilapidated, serious safety hazards ... and real eyesores! The rusted thru and falling down 8-foot perimeter chain link fence is even more of a problem! Lacking realistic detailed plans for restoration (and costs) the "Shacks", and temporary wooden building and the fencing should be torn down and removed just as soon as possible! Retention not removal is planned for the two concrete WWII Coast Artillery Bunkers at the top of the Site (Battery Paul D. Bunker) as well as the two underground Nike Missile Magazines and Elevators, which are located in the middle of the old Nike Site and are essentially out of sight. The two WWII Bunkers could be accessed by trail and utilized as hiking "destinations", with suitable Public Military Commemorative Signage and Plaques ... explaining their past history and intended use. The underground Nike Magazines and Elevators could also be on display and perhaps even operated for Armed Services Day, and recognized by a Plaque and perhaps a plan of the original Nike Site. Details can be worked out later.

OO-5

OO-6

Should anyone be seriously interested in seeing an actual fully restored and operation Hercules Nike Site. ... I understand there is one already restored and open to the public just North of San Francisco and the Golden Gate Bridge. Should the public be interested in seeing an actual Ajax Nike Missile, there is one inside the Ft. MacArthur Museum ... as well as excellent detailed models, brochures, photographs, and explanation of the Nike Missile Program. One brochure shows actual locations of the original Nike Missile Sites of the Los Angeles Defense Area!

OO-7

It should be noted that the various Nike Missile Systems were developed as Anti-Aircraft Defense Systems for the "Cold War", and possible Russian Aggression. Thankfully, they never had to be utilized or fired at Enemy Aircraft! The Nike Systems and Sites may well have played a role in keeping the peace ... so, let's commemorate that (by Plaque or Display) and not go overboard and "glorify" an obsolete system of some historical importance but one that never saw combat. We can and should recognize the role of the dedicated military men and women who serviced with Nike Units here in the Continental USA (CONUS) Europe and elsewhere around the world.

OO-8

Now, specifically to the EIR itself:-

The project Overview, Location and Settings, Project Background and Objectives are well stated ... and include "Remove existing vandalized structures that contribute to aesthetic and safety concerns of the surrounding community." The Planned Project Components are logical, achievable and well considered ... including Visitors Services, Habitat Restoration, Removal of Missile Complex Buildings (Underground storage magazines and elevators ... and the WWII Paul D. Bunker Battery as well to remain). The responsibilities and obligations to be assumed by the PVPLC regarding Park Operation and Maintenance and Management should not be underestimated!

OO-9

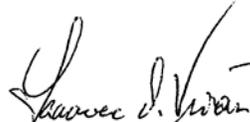
In conclusion:-

- (a) The ramshackle six (6) temporary wood framed structures will seriously detract from the peaceful ambiance of the Nature Preserve. These structures are not permanent civilian type residential buildings ... but temporary wartime military construction that are well passed their useful life.

OO-10

- (b) I do believe that the EIR conclusion reached regarding the 5 Alternatives to the Proposed Project needs to be clarified. Alternative #3 is not the Superior Environmental Project, but only the better of the other four (4) Alternatives to the Project as planned! The Project as planned has strong neighborhood support and represents the true Environmental Superior Solution. | OO-11
- (c) I found Chapter #3A "Cultural Resources", in particular the "Historic Context" (3A.2.2) to be absolutely fascinating! Good job. | OO-12
- (d) Congratulations for a well done Draft EIR. | OO-13

Sincerely,



Lawrence D. Vivian

P.S. If you haven't already done so, it might be wise to verify that there is no connection between Sam E. Stokes of the Museum Association and the Stokes of Jones & Stokes. | OO-14

- OO-1 Thank you for your comment illustrating your background as a Veteran of WWII, and as a member of trained military personnel. Your comments will be considered with this in mind.
- OO-2 The Department acknowledges and appreciates your efforts and involvement in the White Point project. Your comments regarding the discussion with one of the commission members is acknowledged. However, the Department acknowledges that it is possible to develop the nature preserve and restore the buildings onsite. The feasibility of restoring the former military structures has not yet been determined, and the ultimate decision will be left to the Board of Recreation and Park Commissioners.
- OO-3 Your comments regarding the efforts by the PVPLC are acknowledged. Your statement regarding the preservation plans for the former military structures is accurate. A preliminary proposal for the restoration and preservation of the military buildings was submitted by the Los Angeles Nike Air Defense Veteran's Association (LANADVA) after the completion of the public review period for the Draft EIR. This plan is in the process of being reviewed by the Department for further consideration, but has not been considered or approved by the Board of Recreation and Parks Commissioners.
- OO-4 Your comments regarding the implementation of restoration efforts, operation, and funding are acknowledged. No funding sources have been identified or retained to date. However, possible funding sources have been identified in other comment letters from the Office of Historic Preservation, the Los Angeles Conservancy, the LANADVA, and Fort MacArthur Museum Association. In the event that one of the alternatives is selected, these possible funding sources will be pursued.
- OO-5 Your opinions regarding the aesthetic and safety concerns associated with the former military structures and the existing chain-link fence are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the project. No other issues regarding the adequacy of the EIR are provided.
- OO-6 The commenter has restated the proposed project. Possible interpretive programming has been proposed for the former military uses. However, specific details have not yet been determined. Your suggestions for display and recognition are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the project. No other issues regarding the adequacy of the EIR are provided.
- OO-7 Your comment regarding the fully restored Hercules Nike Site and the display of the Ajax Nike Missile program are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the project. No other issues regarding the adequacy of the EIR are provided.
- OO-8 Your comments regarding other restored Nike Systems will be forwarded to the decision makers during their deliberations on the EIR and the project. No other issues regarding the adequacy of the EIR are provided.

- OO-9 Your comments in favor of the project objectives are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the project. No other issues regarding the adequacy of the EIR are provided.
- OO-10 Your opinions regarding the aesthetic effects of retaining the buildings are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the project. No other issues regarding the adequacy of the EIR are provided.
- OO-11 The Draft EIR recognizes Alternative 3 as the Environmentally Superior Alternative because it is the only alternative that fully eliminates significant impacts associated with removal of the historical resources onsite. While it is recognized that this may not be considered the most "superior" or accepted alternative to the local community, from an environmental perspective it is considered the most environmentally superior alternative when evaluated in accordance with the CEQA Guidelines. CEQA requires that only physical impacts to the environment be considered, and does not take into account cost of restoration, or political acceptance. This is left to the decision makers during the Findings of Fact and deliberations on the project. Therefore, Alternative 3 is adequately described as the environmentally superior alternative.
- OO-12 Thank you for your comments commending the discussion in Chapter 3A, "Cultural Resources." Your comments are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the project. No other issues regarding the adequacy of the EIR are provided.
- OO-13 Thank you for your comments commending the Draft EIR. Your comments are acknowledged and will be forwarded to the decision makers during their deliberations on the EIR and the project. No other issues regarding the adequacy of the EIR are provided.
- OO-14 As a point of clarification, there is no connection between Sam E. Stokes of the Fort MacArthur Museum Association and the firm of Jones & Stokes, which prepared the Draft EIR.

Aug- 14, 2001

David Attaway, Environmental Supervisor
City of L.A. Dept. of Rec. & Parks
200 N. Main St., room 709
Los Angeles, CA 90012

Dear Sir:

As an environmental science teacher at San Pedro High School I would like to endorse the continued use of White Pt. Park in San Pedro as a nature preserve consistent with the present backing of Recreation and Parks with the stewardship of the Palos Verdes Peninsula Land Conservancy.

PP-1

For the past three years as faculty sponsor for San Pedro High's Earth Club in conjunction with the Audubon Society's "Audubon Yes!" program, we have contributed nearly 150 people hours each year clearing non-native plants and planting and maintaining native plants. This gives my students a chance to voluntarily contribute something they feel is worthwhile to the community as well as to get to the site on weekends to observe wildlife and relate field biology to concepts studied in my biology and environmental classes.

In past years before the park was made more secure, we have used the area for class field trips during school hours. Also when Rec. and Parks first acquired the property in the late 1970's, the YMCA Indian Guides Program provided my son's group an occasion for overnight camping. The wildlife I've observed over the years range from gray fox, Peregrine falcon, Red Tailed, Coopers and Sparrow hawkls, White-Tailed Kites, Snowy Egret, Cattle Egret, Great Blue Heron to several species of reptiles, insects and arachnids.

PP-2

Audubon has used the area for its annual Christmas bird counts for the past 25 years I can personally account for. During this spring's bird-a-thon, I recorded a first for this location, a yellow-headed blackbird, along with several Red Winged and Brewers blackbirds and the usual Western meadowlarks.

PP-3

With the support of Recreation and Parks, the community connections of the P.V. Land Conservancy and the Peninsula Audubon Society, community and school groups can benefit immensely from a nearby location with such people participation potential as a nature preserve at White Pt. Park.

Sincerely,



Dennis Weyrauch,
Biology Teacher
San Pedro High School

- PP-1 Your comments endorsing the proposed use of White Point Park as a nature preserve are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- PP-2 Thank you for your comments regarding wildlife species that you historically observed onsite. Chapter 3B, "Biological Resources" indicates the species observed onsite during studies performed for the EIR, and indicates the species that have the potential to occur onsite. No rare, threatened, endangered or other special status species are currently known to occupy the site. However, implementation of the proposed nature preserve could potentially reintroduce sensitive species to the site. Your comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.
- PP-3 Thank you for your comments regarding bird species that you recently recorded onsite. Chapter 3B, "Biological Resources" indicates the species observed onsite during studies performed for the EIR, and indicates the species that have the potential to occur onsite. No rare, threatened, endangered or other special status species are currently known to occupy the site. However, implementation of the proposed nature preserve could potentially reintroduce sensitive species to the site. Your comments will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No other issues regarding the adequacy of the EIR are provided.

Gayle A. Williamson
CHAMP & MABEL COLLECTIBLES
1007 S. Malgren Avenue
San Pedro, CA 90732
champandmabel@earthlink.net
(310) 833-8629

August 10, 2001

Mr. David Attaway
Environmental Supervisor
City of Los Angeles
Department of Recreation and Parks
200 N. Main Street, Room 709
Los Angeles, CA 90012-4120

Dear Mr. Attaway,

I have read the Draft Environmental Impact Statement for the White Point Park Nature Preserve Master Plan. I would like to encourage you to use Alternative 3 for the development of this master plan. The historical sites that will be preserved under this alternative add to the rich history of the entire peninsula and harbor area.

QQ-1

I have supported a nature preserve for the White Point property since it was proposed as a state park back in the 1980s. I continued to support the nature preserve that is currently being considered. However, I also support the preservation of the historic sites in the area, especially since Alternative 3 will include the nature preserve and preservation of the historic sites. Given that these sites are still standing, what a pity it would be to lose them now. Remember years ago Los Angeles wanted to tear down the Point Fermin Lighthouse. And yes, I know these buildings are not as physically attractive as the lighthouse, but I feel they are just as important historically.

QQ-2

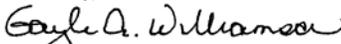
I also think the preservation of these sites at White Point is certain to attract visitors interested in military, Los Angeles and Japanese-American history, who will shop and dine in our community. As a small business owner in San Pedro who rents space in a local antique mall where I sell collectibles including military and local memorabilia, additional visitors to the area will boost my sales.

QQ-3

Again, I encourage you to develop White Point as described in your proposed Alternative 3.

QQ-4

Sincerely,


Gayle Williamson

cc: Councilwoman Janice Hahn

- QQ-1 Your comment in favor of Alternative 3 as identified within the Draft EIR, and your opinion suggesting that the preservation of the historical sites would add to the rich history of the entire peninsula and harbor area, are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- QQ-2 Your comments and opinions regarding the preservation and importance of the historic sites are acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- QQ-3 Your opinion regarding the attraction of visitors as a result of preservation of the sites at White Point are acknowledged. However, these opinions are highly speculative and would not result in any physical impacts to the environment. Your comment will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.
- QQ-4 Your comment in favor of Alternative 3 as identified within the Draft EIR is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.

3612 Barbara Street
San Pedro, CA 90731
(310) 547-1959

August 10, 2001

Via Fax: (213) 617-0439

David Attaway, Environmental Supervisor
City of Los Angeles Department of Recreation and Parks
200 N. Main Street, Room 709
City Hall East
Los Angeles, CA 90012

Re: Draft Environmental Impact Report for the White Point Nature Preserve.

Dear Mr. Attaway,

I strongly support the proposed project at White Point Nature Preserve as described in the Draft EIR. I would not consider any of the Alternatives proposed in the EIR to be satisfactory.

RR-1

I urge you to forward the Draft EIR to your Board for certification.

Thank You,



Karen Winter

Response to Comments

White Point Park Nature Preserve
September 2001

RR-1 Your comment in favor of the proposed project and in opposition to the alternatives presented in the EIR is acknowledged and will be forwarded to the decision makers during their deliberation on the EIR and the proposed project. No issues regarding the adequacy of the EIR are provided.

Section 3

Errata to the Draft Environmental Impact Report

Section 3 Errata to the Draft EIR

Introduction

As provided in Section 15088(c) of the CEQA Guidelines, responses to comments may take the form of a revision to the Draft EIR or may be a separate section in the Final EIR. This section complies with the latter, and provides changes in this section in revision mode text (i.e., deletions are shown with ~~striketrough~~ and additions are shown with double underline). These notations indicate changes to the Draft EIR to provide clarification, corrections, or minor revisions as needed as a result of public comments.

Changes to the Draft EIR

The following text changes are incorporated into the Final EIR as presented below.

Page 1-5 (See Response K6)

City of Los Angeles Department of City Planning

The project requires a Local Coastal Development Permit for the implementation of the nature preserve. The City of Los Angeles Department of City Planning has jurisdiction over local coastal development permits for all public projects throughout the corporate boundaries of Los Angeles. The proposed project is not expected to require modification to the City's Community/General Plan.

California Coastal Commission

The project will also require review by the California Coastal Commission (CCC) for the Local Coastal Development Permit issued by the City. All areas within the coastal zone are subject to oversight by the CCC. The City of Los Angeles has been designated by the CCC to implement and enforce local coastal policies in accordance with the California Coastal Act within their coastal jurisdictions. The CCC only has appeal authority of local permits. However, because there is no adopted/certified Local Coastal Plan for this area, CCC must issue a Coastal Development Permit prior to project implementation.

Page 1-5 (See Responses D1, D2, and I4)**City of Los Angeles Department of Transportation**

The City of Los Angeles Department of Transportation (LADOT) is the local government jurisdiction with oversight over transportation-related improvements of local transportation facilities. The locations for site ingress and egress, and any transportation related improvements requires approval by LADOT.

California Department of Transportation (Caltrans)

Caltrans is the state governmental agency with oversight over transportation-related decisions affecting State Highways. Impacts on Western Avenue would require permits and approvals from Caltrans.

Page 2-2 (See Response K-1)

Again, no significant action was taken on the adopted Master Plan, and the site continued to deteriorate, inviting trespassing, vandalism, and other illegal activities. In January 1999, Los Angeles City Councilman Rudy Svorinich formed a new 12-member White Point Citizen's Advisory Committee to review the 1991 Master Plan and recommend changes to it. That~~The latest~~ Citizen's Advisory Committee recommended made a recommendation to the Board of Recreation and Park Commissioners at its meeting in December 1999, to "dedicate the entire site as a coastal nature preserve where habitat and the natural environment will be preserved and enhanced over the long term." This recommendation was endorsed by the Board of Recreation and Park Commissioners. In addition, staff was directed to prepare the required environmental documents under CEQA in order for the Commission to consider the future adoption of the Master Plan and implementation of other project components.

Page 2-2 (See Response O23)

In an effort to ensure community involvement in the planning process, the White Point Park Nature Preserve Steering Committee (Steering Committee) was created in May 2000. The Steering Committee, officially appointed by Councilman Svorinich and the Department, consists of thirteen volunteers from a broad cross-section of the community. The proposed project is a culmination of these activities leading up to the present day, which includes elements of the Palos Verdes Peninsula Land Conservancy (PVPLC) Draft Master Plan, and proposals by the Department to eliminate the existing former aboveground military structures.

The Framework Draft Master Plan establishes a series of goals for the Preserve, which provide a strong foundation for the proposed land use decisions and policy recommendations. The following project objectives encompass these goals, plus goals of the Department and the surrounding community, which ~~that~~ serve as the foundation for the future of the park:

- Provide safe and accessible natural parkland for broad regional use and enjoyment.
- Create passive recreational and educational opportunities that will inspire visitor appreciation of the scenic value and ecological, cultural, and historic significance of the preserve.
- Enhance the ecological value of the preserve through the restoration of native habitat and plant communities.
- Prohibit uses, such as active recreation fields, that would conflict with the nature preserve and have the potential to adversely affect sensitive natural resources.
- Remove existing vandalized structures that contribute to aesthetic and safety concerns of the surrounding community.
- Maintain the major contributing features of the site that present the site's significance in military air defense since World War II.

Page 2-5 (See Response O23)

2.3 Project Components

The project area offers numerous opportunities to create park usage that make use of the natural resources and topography of the site. The planned land use improvements promote sustainability and integrity of the natural areas while providing for a mix of compatible passive recreation uses. The project components are a combination of the Draft Master Plan and the Department's proposal for removal of the former military buildings, which are characterized by generally focused into 4 major components—visitor services and facilities, habitat restoration, removal of existing Nike missile system structures, and park operations and maintenance. The major components of the project are described below and are shown in figure 2-5.

Pages 3A-16 and 3A-17 (See Response C5)

Mitigation Measure A-4: Interpretive Program for the White Point Nike Launcher Area Missile Site 43L Historic District

As part of the larger interpretive program for natural resources, the City will develop interpretive programs for the White Point Historic District. The program will include the installation of interpretive displays in the vicinity of the remaining launch pad and Battery Paul D. Bunker to afford visitors the opportunity to understand the context and significance of those remaining features of the Historic District. These interpretive displays shall include photographic documentation of the historical resources that will be removed. The City will coordinate with the San Pedro Historical Society and the Los

Angeles Nike Air Defense Veteran's Association to identify opportunities to link the Preserve's interpretive programs with other interpretive programs aimed at providing the public with a greater understanding of the area's military history.

Page 3C-15 (See Response J1)

Pursuant to Title 27, CCR, Section 21190, the City of Los Angeles Environmental Affairs Department is the Local Enforcement Agency (LEA) — the local government jurisdiction with oversight over landfill closures. The closure of the landfills on-site requires approval and action by the LEA.

Page 3D-3 (See Responses D1 and D2)

With respect to transportation issues, the proposed project is subject to the requirements of the City of Los Angeles Department of Transportation, and the California Department of Transportation (Caltrans) has jurisdiction for any impacts along Western Avenue because it is a State Highway. No specific requirements have been identified at this time. The proposed project would require an Encroachment Permit from Caltrans if any work is performed within the state right-of-way, and would require a Transportation Permit if oversized vehicles travel on state highways.

Page 3D-10 (See Response I4)

Mitigation Measure D-2

In the event of any required lane closures along Paseo del Mar, a construction traffic control plan Traffic Construction Management Plan shall be prepared and approved by the City of Los Angeles Department of Transportation (LADOT) prior to disruption of traffic flows the start of any construction work. The plan shall show the location of any roadway or lane closures, traffic detours, haul routes, hours of operation, flagmen, protective devices, warning signs and maintenance of local access and bike lanes on Paseo del Mar. The contractor shall coordinate with LADOT to provide adequate safety and control measures during construction activities.

Page 3E-2 (See Response K6)

3E.3 Applicable Regulations

The proposed project is governed by state and city land use regulations. Through the California Coastal Act of 1976, the California Coastal Commission (CCC) has jurisdiction on land use and planning decisions within the Coastal Zone and provides oversight to the City of Los Angeles because there is no adopted/certified Local Coastal Plan for this area of the City. The primary land use

regulatory mechanisms of the city includes the general plan and zoning ordinance. These documents provide a blueprint for development throughout the planning area. The applicable planning programs are discussed below.

Page 3E-3 (See Response K6)

The San Pedro Community Plan Land Use Map designates the White Point Park property for Open Space use. In addition, the map further denotes that the site is intended for recreational purposes as a regional park. The zoning for the site as Open Space is consistent with this land use designation. The parcel was previously designated as a "white hole" for planning purposes under the Fort MacArthur Planning Program that was adopted by the City Council in 1975. The proposed project is intended as a nature preserve, which would be consistent with the zoning and land use designation of the Fort MacArthur Planning Program. Therefore, it is not expected to require amendment to the General Plan or Community Plan.

Page 3E-6 (See Response K6)

3E.4.2.2 Impact E-2. Consistency with Local Land Use Plans

The proposed project is consistent with the land use designations established by the General Plan and the San Pedro Community Plan. The proposed project involves the implementation of a nature preserve, which is consistent with the site's designation as Open Space with a recreational overlay of regional park. The establishment of the nature preserve is also consistent with the Open Space zoning designation of the City's Municipal Code. The parcel was previously designated as a "white hole" for planning purposes under the Fort MacArthur Planning Program that was adopted by the City Council in 1975. The proposed project is intended as a nature preserve, which would be consistent with the zoning and land use designation of the Fort MacArthur Planning Program. Therefore, it is not expected to require amendment to the General Plan or Community Plan. No impacts would occur.

Pages 4-3 and ES-7 (See Response O13, O22, O25)

This alternative is essentially the same as the proposed project but it would restore and preserve the Warhead Assembly Building, the Assembly and Service Building, the Ready Room, and the three Sentry Buildings. This alternative involves removal of the remaining remnant structures, including the concrete slab foundations, associated with the Nike Missile Site. Restoration and preservation of these facilities would involve both cosmetic upgrades of the existing structure and structural upgrades to accommodate potential future reuse of the facilities into the Park. This alternative still involves establishing the nature preserve and

may incorporate the remaining resources into a historical interpretive program. This alternative offers a wide range of preservation, restoration, and rehabilitation options, ranging from creating an idle historical district, to full development of a museum setting and aboveground thematic signing. This alternative was selected to reduce significant impacts associated with removal of portions of the Historic District.

Pages 4-5 and ES-8 (See Response K4)

Alternative 5 was eliminated from further consideration for several reasons. As discussed in Chapter 2, "Project Description," the Citizen's Advisory Committee ~~unanimously~~ recommended that the entire site be dedicated as a coastal nature preserve and specifically not include active recreational facilities. The Board of Recreation and Park Commissioners endorsed this recommendation in December 1999, thereby eliminating active recreation as a desired use for the implementation of any future master plans developed for White Point Park. Therefore, active recreational facilities do not meet the purpose and need of the project as established by the Board of Recreation and Park Commissioners and are not consistent with the project objectives for the White Point Park Nature Preserve. ~~This alternative would not be consistent with the project objectives identified above and in Chapter 2.~~ It should be noted that the City has offered to develop an alternative site for AYSO, and has begun planning the "Field of Dreams" at the former Gaffey Street landfill, a few miles north of the project site.

This alternative also fails to reduce significant impacts associated with the proposed project and could potentially generate new significant impacts on the environment. The removal or degradation of significant historical resources ~~would still~~ could potentially occur with this alternative. It is unclear whether development of soccer fields onsite could be accomplished without removing and/or affecting significant archaeological and or historical resources.

~~Additionally,~~ potential impacts on other resources would likely be greater with this alternative, including but not limited to impacts on biological resources, transportation and parking, aesthetics, and noise. These are discussed separately below.

Biological Impacts. Development of soccer fields would provide less opportunity for the restoration of native habitat and could introduce non-native vegetation, thereby hindering the establishment of a nature preserve. Additionally, soccer fields would require increased maintenance, including possible use of pesticides and herbicides.

Traffic and Parking. Active recreational facilities, such as soccer fields, would generate substantially more traffic than the proposed nature preserve. Based on trip generation rates, impacts on nearby transportation facilities could be significantly greater than the proposed project. Additionally, the project site would require substantially greater parking areas than the proposed project and could result in a spillover effect on nearby residential neighborhoods.

Noise. The additional traffic generated by this alternative, combined with the intensified youth activities on-site, could also substantially increase noise in the vicinity of the project. These noise impacts could result in significant impacts on nearby sensitive noise receptors in the surrounding residential neighborhoods.

Aesthetics. The development of active recreational facilities could result in greater aesthetic impacts than the proposed project. Establishment of active recreational fields would detract from the creation of a sensitive natural environment on the project site. This alternative would directly conflict with project objectives to “create passive recreational and educational opportunities that will inspire visitor appreciation of the scenic value and ecological, cultural, and historical significance of the preserve.” Active recreation could also introduce substantial new nighttime lighting onto a site that is currently unlighted. Intensive nighttime lighting could potentially result in significant spill-over light and glare on neighboring residential uses.

Because this alternative fails to meet the project objectives, and would not reduce significant impacts associated with the proposed project, and could generate new significant impacts, this alternative has been eliminated from further consideration.

Page 3C-19 and Page 5 of Table ES-1 (Minor Change)

Mitigation Measure C-53: Eliminate Hazards through Restricting Access to Hazardous Elements.

Note: This is a minor change due to a typographical error in the Draft EIR.

Section 4

Mitigation Monitoring Plan

Section 4

Mitigation Monitoring Plan

Introduction

The California Public Resources Code, Section 21081.6, requires that a Lead or Responsible Agency adopt a mitigation monitoring plan (MMP) when approving or carrying out a project when an environmental document, either an EIR or a negative declaration, identifies measures to reduce potential adverse environmental impacts to less-than-significant levels. As Lead Agency for the White Point Park Nature Preserve project, the Department is responsible for implementation of the MMP.

A Draft EIR has been prepared for the project that addresses the potential environmental impacts, and where appropriate, recommends measures to mitigate these impacts. As such, an MMP is required to ensure that adopted mitigation measures are successfully implemented. This document lists each mitigation measure, describes the methods for implementation and verification, and identifies the responsible party or parties.

Project Overview

The proposed project site is located within White Point Park, which is situated along the Pacific Ocean bluffs at the southerly base of the Palos Verdes hills in the Los Angeles community of San Pedro.

The project area has a long history of former uses that have contributed to the current conditions of the site. The existing features from the past that are still evident include the Sepulveda Homestead, the Battery Paul D. Bunker, and the Nike Missile battery site.

The proposed project is divided into 4 major components:

- visitor services and facilities,
- habitat restoration,

- removal of existing Nike Missile System structures, and
- park operations and maintenance.

Visitor Services and Facilities

This component includes the development of a trail system throughout the park, including adding new trails, enhancing existing trails, and abandoning some existing trails. This component also includes the establishment of a Native Plant Demonstration Garden, along with a trail that extends through this area, for the exhibition of specimen plants and plant communities that are representative of the plant diversity of the Palos Verdes Peninsula. A new 63-vehicle unpaved parking lot with 3 disabled spaces, 3 bus spaces, and a bicycle area, is proposed with access from Paseo del Mar. Restroom facilities and drinking fountains are planned to be located near the parking area. New perimeter fencing and barriers are proposed, which would allow pedestrian access to the site and restrict vehicle access to only the parking areas on-site. Pedestrian entry points will also be established around the perimeter of the Preserve to allow access from the local community.

Habitat Restoration

This component involves the enhancement and restoration of self-sustaining and functioning native plant communities that provide habitat for native species, especially those that are considered to be rare or sensitive. The primary focus is the restoration and enhancement of remnant patches of coastal sage scrub, southern cactus scrub, and coastal bluff scrub. Areas covered with non-native grassland or disturbed vegetation will also be restored to native grassland or native scrub to recreate and support natural plant and wildlife diversity. Restoration techniques would involve removing invasive, non-native species; eradicating weeds through a combination of mechanical, hand weeding, and herbicide techniques; establishing a native plant nursery for care and propagation of new plants; collecting seeds and propagating new plants on-site; establishing a temporary irrigation system; and conducting ongoing maintenance and monitoring. Fuel modification and fire prevention considerations are proposed in order to protect surrounding residential development, which includes thinning out existing vegetation and spacing new trees and shrubs according to fuel modification guidelines.

Removal of Nike Missile Complex Structures

This component involves demolition and removal of the aboveground structures and foundations that are associated with the former Nike Missile program. The facilities that are proposed for removal include the Warhead Assembly Building, the Assembly and Service Building, the Ready Room Building, and the three

Sentry Buildings. The existing Nike Missile launch facility and underground storage magazines and the Battery Paul D. Bunker would remain in their current condition. No physical changes are proposed for these facilities.

Park Operations and Maintenance

This component involves all of the administrative and maintenance activities associated with the proposed nature preserve. The park will be open to the public, without fee, from dawn to dusk, and will be patrolled on a regular basis for security. A grounds maintenance program will be developed in order to properly maintain the physical grounds and to provide for the safe upkeep of the park's facilities. The general maintenance services will be performed by the Department. The habitat restoration areas will be managed and maintained by the Palos Verdes Land Conservancy (PVPLC) and supplemented with volunteers. The PVPLC will provide a site manager to oversee the management of the Preserve and its daily administrative and programming needs, as well as a stewardship director to manage and monitor the habitat restoration and native plant nursery operations at the Preserve. Educational programming will be a part of operations at the Preserve.

Monitoring and Reporting Procedures

The MMP for the proposed project will be in place through all phases of the project, including design, construction, and operation. The Department shall be responsible for administering the MMP and ensuring that all parties comply with its provisions. The Department may delegate monitoring activities to staff, consultants, or contractors. The Department will also ensure that monitoring is documented through periodic reports and that deficiencies are promptly corrected. The designated environmental monitor will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to rectify problems.

Mitigation Monitoring Plan Implementation

Table 1 lists each mitigation measure included in the Draft EIR by resource area. Certain inspections and reports may require preparation by qualified individuals and these are specified as needed. The timing and method of verification for each measure is also specified.

Table 1. Mitigation Monitoring Plan Summary

Impact	Mitigation Measure	Timing of Implementation	Method of Implementation	Responsible Party or Parties
Cultural Resources Damage or Destruction of Known Significant Archaeological Resources	<p>Mitigation Measure A-1: Avoid Known Archaeological Sites. Known significant archaeological sites shall be avoided by the following measures:</p> <ul style="list-style-type: none"> ■ Design trail locations that do not cross archaeological sites. Proposed trails shall be at least 100 feet from the boundaries of known significant archaeological sites. ■ The locations of archaeological sites shall not be indicated by the use of signs or other means. ■ Any interpretive exhibits addressing the prehistoric and historic land uses shall be at least 100 feet from known archaeological sites. <p>Archaeological site locations shall be identified on a copy of the project design maps so that design specification will avoid significant archaeological sites. This copy of the design maps will be marked confidential and will not be filed in the public domain in order to protect significant resources from vandalism.</p>	<p>During project design, prior to construction</p> <p>Throughout the life of the project</p> <p>Throughout the life of the project</p>	<p>During the final design phase, the Department and the Palos Verdes Peninsula Land Conservancy (PVPLC) shall consult with a qualified archaeologist to determine the extent of the archaeological sites. These sites shall be avoided or mitigated accordingly to reduce potential impact to known sites. These sites will be identified on confidential maps that are available to the designers in order to protect significant resources from vandalism.</p> <p>During any interpretive program designs, the designers shall consult the same maps to avoid installation of interpretive exhibits at or within 100 feet of known archaeological sites.</p>	<p>Department of Recreation and Parks; PVPLC; Contractors involved in project design and interpretive programming</p>

ACM = Asbestos-containing materials
 Department = Department of Recreation and Parks
 LBP = Lead-based paint

LARWQCB = Los Angeles Regional Water Quality Control Board
 PVPLC = Palos Verdes Land Conservancy
 RWQCB = Regional Water Quality Control Board

Table 1. Continued.

Impact	Mitigation Measure	Timing of Implementation	Method of Implementation	Responsible Party or Parties
Potential for Ground-Disturbing Activities to Damage Previously Unidentified Buried Cultural Resource Sites	<p>Mitigation Measure A-2: Stop Work if Cultural Resources are Discovered during Ground-Disturbing Activities.</p> <p>If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or non-human bone are inadvertently discovered during ground-disturbing activities, work will stop in that area and within 100 feet of the find until a qualified archaeologist can assess the significance of the find, and, if necessary, develop appropriate treatment measures. Treatment measures typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation.</p> <p>The construction contractor and lead contractor compliance inspector will verify that work is halted until appropriate treatment measures are implemented if cultural resources are discovered during construction activities. Concurrence from the Los Angeles Department of Recreation and Parks on measures to be implemented before resuming construction activities in the area of the find will be obtained.</p>	<p>During construction phases involving ground-disturbing activities, such as trenching, excavating, and grading. Planting and vegetation-clearing activities would not require implementation of this mitigation measure.</p>	<p>Monitoring of construction by construction manager. Construction activities shall cease if any potential resources are uncovered and a qualified archaeologist shall be contacted to assess the significance of the find and determine any further action</p>	<p>Construction Manager; Department of Recreation and Parks</p>

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Table 1. Continued.

Impact	Mitigation Measure	Timing of Implementation	Method of Implementation	Responsible Party or Parties
Potential to Damage Previously Unidentified Human Remains	<p>Mitigation Measure A-3: Comply with State Laws Pertaining to the Discovery of Human Remains.</p> <p>If human remains of Native American origin are discovered during ground-disturbing activities, it is necessary to comply with state laws relating to the disposition of Native American burials, which falls within the jurisdiction of the Native American Heritage Commission (Pub. Res. Code Section 50977). If human remains are discovered or recognized in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until</p> <ul style="list-style-type: none"> ■ the coroner of the county has been informed and has determined that no investigation of the cause of death is required; and ■ if the remains are of Native American origin, <ul style="list-style-type: none"> ▪ the descendants of the deceased Native Americans have made a recommendation to the land owner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Pub. Res. Code Sec. 5097.98, or ▪ the Native American Heritage Commission was unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being notified by the commission. <p>According to California Health and Safety Code, 6 or more human burials at 1 location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the coroner must contact the California Native American Heritage Commission.</p>	<p>During construction phases involving ground-disturbing activities, such as trenching, excavating, and grading.</p>	<p>Implementing Monitoring by the construction manager. Construction activities shall cease if any potential human remains are uncovered and the coroner shall be contacted. If the coroner determines that the remains could be of Native American origin, the Native American Heritage Commission shall be contacted. Construction shall not resume until the appropriate authorities provide clearance.</p>	<p>Construction Manager; Department of Recreation and Parks</p>

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Table 1. Continued.

Impact	Mitigation Measure	Timing of Implementation	Method of Implementation	Responsible Party or Parties
Demolition and Removal of Features that Convey the Significance of a Significant Historical Resource	<p>Mitigation Measure A-4: Interpretive Program for the White Point Nike Launcher Area Missile Site 43L Historic District.</p> <p>As part of the larger interpretive program for natural resources, the City will develop interpretive programs for the White Point Historic District. The program will include the installation of interpretive displays in the vicinity of the remaining launch pad and Battery Paul D. Bunker to afford visitors the opportunity to understand the context and significance of those remaining features of the Historic District. The City will coordinate with the San Pedro Historical Society and the Los Angeles Nike Air Defense Veteran's Association to identify opportunities to link the Preserve's interpretive programs with other interpretive programs aimed at providing the public with a greater understanding of the area's military history.</p>	During design of nature preserve interpretive program	The Department or the PVPLC shall retain a qualified cultural resources professional to assist in the design of an interpretive program on the project site. At a minimum the San Pedro Historical Society and the Los Angeles Nike Air Defense Veteran's Association shall be contacted to assist in the programming.	Department of Recreation and Parks, PVPLC
Continued Degradation of a Significant Historical Resource Due to Neglect, Vandalism, or Lack of Maintenance	<p>Mitigation Measure A-5: Maintenance and Condition Monitoring Procedures.</p> <p>The Master Plan for the Preserve states that a grounds maintenance program will be developed to properly maintain the physical grounds and that specific duties to be performed on a regular basis will be identified and incorporated into the Department's maintenance responsibilities. The City will ensure that a preservation architect who meets the Secretary of the Interior's professional qualification standards and has demonstrated experience developing cyclical maintenance programs for historic resources is a member of the team that develops this program. Policies and procedures will be included that are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. As part of the process to develop the grounds maintenance program the City will determine the appropriateness of installing fencing or other access barriers around the launch pad.</p>	During the development of a grounds maintenance program; throughout the life of the project	The Department shall retain a qualified preservation architect to assist in the development of a grounds maintenance program to maintain and protect the remaining historical resources onsite. The maintenance and monitoring procedures shall be adhered to throughout the life of the project.	Department of Recreation and Parks

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Table 1. Continued.

Impact	Mitigation Measure	Timing of Implementation	Method of Implementation	Responsible Party or Parties
Disturbance of Significant Paleontological Resources	<p>Mitigation Measure A-6: Preconstruction Consultation and Construction Monitoring.</p> <p>A paleontological resource monitoring plan shall be developed by a qualified paleontologist. This plan should include a review of construction plans to determine whether activities may disturb geologic formations and, in effect, may be likely to produce impacts on paleontological resources. A grading observation schedule shall be maintained when significant ground disturbances/grading is being undertaken in bedrock units to further evaluate and protect the fossil resources of the site.</p> <p>A qualified paleontologist shall make a scientific evaluation of any fossil remains, either vertebrate or invertebrate, which may have been discovered in the process of earth removal. This evaluation would determine the level of necessity of making a scientific collection of the encountered paleontological resources.</p> <p>Salvage operations shall be initiated if significant paleontological resources are encountered. A qualified paleontologist shall make salvage collections, as they deem necessary, for the recovery of the affected paleontological resources.</p>	<p>Prior to and during construction phases of the project that involve ground-disturbing activities</p>	<p>The Department or the PVPLC shall retain a qualified paleontologist to develop a paleontological resource monitoring plan. Monitoring shall be conducted throughout ground-disturbing activities and construction shall cease if potentially significant fossil remains are discovered. Construction shall not resume until the resources are assessed and clearance is provided. In the event that significant resources are unearthed, a salvage program shall be initiated as necessary.</p>	<p>Department of Recreation and Parks; PVPLC</p>

ACM = Asbestos-containing materials
 Department = Department of Recreation and Parks
 LBP = Lead-based paint

LARWQCB = Los Angeles Regional Water Quality Control Board
 PVPLC = Palos Verdes Land Conservancy
 RWQCB = Regional Water Quality Control Board

Table 1. Continued.

Impact	Mitigation Measure	Timing of Implementation	Method of Implementation	Responsible Party or Parties
Hazards and Hazardous Materials				
Consistency with Regulatory Requirements Protecting Public Health and Safety	<p>Mitigation Measure C-1: Obtain Closure from the Los Angeles Regional Water Quality Control Board (LARWQCB).</p> <p>Prior to implementation of the proposed project the Department shall obtain a "No Further Action" determination by the LARWQCB, or work with the LARWQCB to identify appropriate strategies that satisfy closure requirements, which could potentially involve deed restrictions and/or long-term groundwater monitoring.</p>	Prior to implementation of the project	<p>The Department shall coordinate with the Regional Water Quality Control Board (RWQCB) to negotiate and implement appropriate closure strategies to reduce health and ecological effects from the former landfills onsite. A "No Further Action" or conditional determination shall be received from the RWQCB prior to implementation of the project.</p>	Department of Recreation and Parks; Los Angeles Regional Water Quality Control Board
	<p>Mitigation Measure C-2: Properly Handle and Dispose of Asbestos-Containing Materials and Substances Containing Lead-Based Paint.</p> <p>Before demolishing the buildings that are proposed for removal, and before the park is opened to the public, the Department shall commission a contractor to assess the three Sentry Buildings that were not previously investigated for the potential to contain asbestos-containing materials (ACMs) and lead-based paint (LBP). All asbestos and LBP substances that are identified within the remaining six buildings on-site shall be properly abated in accordance with federal, state, and local regulations.</p>	Prior to demolition of the former military structures	<p>The Department shall commission a contractor to assess, and if necessary abate all asbestos on site.</p>	Department of Recreation and Parks

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Table 1. Continued.

Impact	Mitigation Measure	Timing of Implementation	Method of Implementation	Responsible Party or Parties
Health and Safety Consequences from existing Health Hazards	<p>Mitigation Measure C-3: Eliminate Hazards Through Restricting access to hazardous elements.</p> <p>Measures shall be incorporated into the project design to restrict public access from the edges of the top of the Battery Paul D. Bunker, and from the doors of the missile silos. These measures may consist of installation of railings, fencing, or some other physical barriers along with appropriate signage to prevent access to these areas.</p>	During project design and prior to opening the park to public access	The Department or the PVPLC shall identify design measures to restrict public access from the edges of the top of the Battery Paul D. Bunker, and from the doors of the missile silos to avoid potential safety hazards	Department of Recreation and Parks; PVPLC
Transportation and Traffic				
Potential Transportation-Related Hazards	<p>Mitigation Measure D-1. During final project design of the fencing and exit driveway, the fencing, landscaping, and any other potential obstructions shall be constructed/maintained below 30 inches above the roadway elevation.</p>	During final project design and throughout the life of the project	The project architect and contractor shall avoid installing any visual obstructions at or near the exit driveways. This shall also be monitored throughout the life of the project to prevent vegetation/landscaping from blocking views for drivers exiting the site	Department of Recreation and Parks; PVPLC

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Table 1. Continued.

Impact	Mitigation Measure	Timing of Implementation	Method of Implementation	Responsible Party or Parties
Impacts to Emergency Access and Street Closures	Mitigation Measure D-2. In the event of any required lane closures along Paseo del Mar, a construction traffic control plan shall be prepared and approved by the City of Los Angeles Department of Transportation (LADOT) prior to disruption of traffic flows. The contractor shall coordinate with LADOT to provide adequate safety and control measures during construction activities.	Prior to and during construction	The Department of Recreation and Parks shall submit to LADOT a Traffic Management Plan describing the potential effects and identifying appropriate safety measures to reduce impacts to the roadway system	Department of Recreation and Parks; Contractor; LADOT
	Mitigation Measure D-3. During construction phases, if lane closures are required, these activities shall be limited to off-peak traffic periods, and full-service shall be restored at the end of each work period prior to peak traffic periods to reduce impacts to traffic flows.	Prior to and during construction phases	As part Mitigation Measure D-2, the Traffic Management Plan shall specify that lane closures be limited to off-peak traffic periods, and full-service shall be restored at the end of each work period prior to peak traffic periods to reduce impacts to traffic flows. The contractor shall implement the Traffic Management Plan accordingly.	Department of Recreation and Parks; Contractor

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