

COASTAL CONSERVANCY

Staff Recommendation  
November 30, 2023

**PALOS VERDES BLUE BUTTERFLY RECOVERY PROJECT**

Project No. 23-072-01  
Project Manager: Dario Bobeda-Padilla

**RECOMMENDED ACTION:** Authorization to disburse up to \$5,000,000 to the Palos Verdes Peninsula Land Conservancy for the Palos Verdes Blue Butterfly Recovery Project, consisting of the removal of 325 acres of invasive plant species, restoration of 17 acres for native butterfly habitat, creation of a native seed bank, and reconstruction of a butterfly rearing facility.

**LOCATION:** Palos Verdes Nature Preserve, Rancho Palos Verdes, Los Angeles County

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EXHIBITS

Exhibit 1: [Project Location Maps](#)

Exhibit 2: [Photos](#)

Exhibit 3: [Project Letters](#)

Exhibit 4: [California Environmental Quality Act Documents](#)

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**RESOLUTION AND FINDINGS**

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed five million dollars (\$5,000,000) to the Palos Verdes Peninsula Land Conservancy (“the grantee”) to carry out the Palos Verdes Blue Butterfly Recovery Project, consisting of the restoration of 342 acres through the removal of 325 acres of invasive plant species and planting of 17 acres of native butterfly habitat, creation of a native seed bank, and reconstruction of a butterfly rearing facility.

Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.

2. Names and qualifications of any contractors to be retained in carrying out the project.
3. A plan for acknowledgement of Conservancy funding.
4. Evidence that all permits and approvals required to implement the project have been obtained.
5. Evidence that the grantee has entered into agreements sufficient to enable the grantee to implement, operate, and maintain the project.
6. Prior to commencing the project, the grantee shall enter into and record an agreement pursuant to Public Resources Code 31116(d) sufficient to protect the public interest in the improvements.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 6 of Division 21 of the Public Resources Code, regarding the Climate Ready Program.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. The Palos Verdes Peninsula Land Conservancy is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code.
4. The Conservancy has independently reviewed and considered the two Environmental Impact Reports listed below that were adopted by the City of Rancho Palos Verdes pursuant to the California Environmental Quality Act (“CEQA”) and attached to the accompanying staff recommendation as Exhibit 4. The Conservancy finds that the proposed project as designed and mitigated avoids, reduces, or mitigates the potentially significant environmental effects to a less-than-significant level, and that there is no substantial evidence based on the record as a whole that the project may have a significant effect on the environment, as defined in 14 Cal. Code Regulations Section 15382.

The two applicable CEQA documents are:

- a. Final Environmental Impact Report (FEIR) for the Rancho Palos Verdes Natural Communities Conservation Planning Subarea Plan (Project No. /State Clearinghouse No. 2003071008). Certified July 2004.
- b. FEIR Addendum for the Rancho Palos Verdes Natural Community Conservation Plan and Habitat Conservation Plan (State Clearinghouse No. 2003071008). Certified March 2018.

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## STAFF RECOMMENDATION

### PROJECT SUMMARY:

Staff recommends the Conservancy authorize a \$5,000,000 grant to the Palos Verdes Peninsula Land Conservancy (PVPLC) for the Palos Verdes Blue Butterfly Recovery Project, consisting of

the restoration of 342 acres through the removal of 325 acres of invasive plant species and planting of 17 acres of native butterfly habitat, creation of a native seed bank, and reconstruction of a butterfly rearing facility. The habitat restoration activities will take place within the Palos Verdes Nature Preserve (Preserve) which is owned by the City of Rancho Palos Verdes (City) and the seed bank and reconstructed butterfly rearing facility will be located near PVPLC's native plant nursery on United States Navy (Navy) owned property within the City of Los Angeles (Exhibit 1).

The federally endangered Palos Verdes blue butterfly (PVBB) is endemic to the project area, where it was thought to be extinct due to loss of habitat until rediscovered in the 1980s. PVPLC has worked with several partners on the recovery of the species including the Navy, US Fish and Wildlife Service (USFWS), Moorpark College, Urban Wildlands Group, and the City, focusing on breeding the butterfly in captivity and creating habitat suitable for the release and sustainability of wild populations. The species faces an uncertain future of genetic bottleneck, and the recovery of the species will depend on the creation and management of multiple suitable habitat sites within the project area.

The proposed project is a four-pronged approach to species recovery: removal of 325 acres of nonnative plants to make space for the future recovery of native habitat; active restoration of 17 acres of native habitat; creation of a native seed bank to support restoration efforts; and establishment of a safe secure captive rearing facility to support recolonization of habitat areas. In addition to the PVBB, the restored habitat will support other special status species including the federally endangered El Segundo blue butterfly, the federally threatened Coastal California Gnatcatcher, and the Cactus Wren, a state species of concern. The removal of invasive plants and replacement with beneficial plants will provide essential habitat needed for sensitive wildlife species to thrive and will reduce the threat of wildfire, increasing resilience of those species and adjacent human communities.

The PVPLC was started by local volunteers and has long had support for the acquisition and restoration of the land on the peninsula. PVPLC is part of various regional and statewide groups focused on diversity, equity, inclusion, and justice and strives to include Black, Indigenous, and People of Color perspectives and engagement in their projects. The proposed project will engage local Conservation Corps youth who will assist with vegetation removal and volunteers from the local community who will participate in plant propagation and seed collection.

To implement the proposed project, PVPLC will mobilize its trained field technicians, local Conservation Corps youth, and goat herds to remove over 70 acres of invasive trees/shrubs including Acacia (*Acacia cyclops*) and Peppertree (*Schinus spp.*) as well as over 255 acres of annual weeds like mustard (*Brassica spp.*), tumbleweed (*Salsola spp.*), fennel (*Foeniculum vulgare*), and nonnative grasses. Areas proposed for invasive species removal are located across multiple reserves and are situated on slopes where PVBB were known to have historically existed. The removal of these invasive species will make space for the future recovery of PVBB habitats and reduce the threat of wildfire. PVPLC will also actively restore 17 acres in the Glass Reserve with PVBB habitat, as well as coastal sage scrub and cactus scrub species to support other sensitive species. PVPLC will reintroduce host plants through seeding techniques and container planting. Irrigation will be installed and maintained to ensure growth of native plants.

Crews will intensively clear regrowth of nonnatives to provide suitable habitat for the release of captive-bred PVBB. A native seedbank will be created and maintained through wild collection, contract growing and local cultivation as well as expansion of native plant propagation to ensure sustainability of plant resources for future restoration projects. These actions will also support the nursery already located at the facility. The California Conservation Corps and volunteers will participate in collecting and managing the nursery and seedbank. The rearing facility will house a captive-reared PVBB population to aid with the recovery plan goal to avoid catastrophic loss of one central population of pupae and larvae. PVPLC will replace the existing, deteriorating nursery and rearing facility on its property with a new safe and secure facility for this purpose. The current rearing facility has fallen into disrepair, with a leaky roof, and rotted walls and floor. Funding will go towards replacing the facility with a doublewide modular office, which will be used past project completion. The proposed project will substantially increase the PVBB's chances of survival. After this project is completed, PVPLC will continue to manage the restored reserve areas for the preservation of the PVBB and other special status species.

**Site Description:** The Palos Verdes Nature Preserve includes 1,500 acres of preserved and protected public land with over 30 miles of trails, much of which is surrounded by single family homes. The Preserve is made up of twelve reserves located within the City. The reserves are home to several special status species, including the federally endangered PVBB, whose habitats are threatened by invasive plant species. Project activities will take place in all the reserves, except for the Malaga Canyon, Vista Del Norte, Agua Amarga, and Ocean Trails reserves. See Exhibit 1. The project areas consist mainly of the Coastal Sage Scrub plant community which is currently overrun by *Acacia Cyclops* as well as other non-native brush like mustard, tumbleweed, fennel, and nonnative grasses, which are invasive and highly flammable. See Exhibit 2.

The Preserve is owned by the City, which established the Preserve pursuant to the Rancho Palos Verdes Natural Community Conservation Plan. This plan also establishes PVPLC as "Habitat Manager". PVPLC and the City have a Forrestral Management Agreement which establishes PVPLC's management responsibilities as the preserve habitat manager for all conserved land in the Preserve.

The native plant nursery and proposed butterfly rearing facility are located on property owned and operated by the Navy within the City of Los Angeles. The PVPLC has entered an agreement with the Navy to replace the existing facility and continue to use the facility after its replacement.

**Grant Applicant Qualifications:** PVPLC and the City have partnered on projects to acquire reserve lands and restore and protect habitat within the Preserve for over 30 years. PVPLC has successfully implemented over 200 acres of habitat restoration through dozens of grant-funded projects to support covered species such as the PVBB in coordination with multiple stakeholders and community groups. PVPLC has experience managing grants from various state agencies, including multiple grants from the Conservancy to restore habitat within the Preserve. PVPLC's adaptive management approach along with close management of the land ensures the lasting success of restoration projects within the Preserve.

**CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:**

The proposed project is consistent with the Conservancy's Project Selection Criteria, last updated on September 23, 2021, in the following respects:

**Selection Criteria**

**1. Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.**

See the "Consistency with Conservancy's Strategic Plan" section below.

**2. Project is a good investment of state resources.**

The proposed project is a good investment of state funding. The project will restore native habitat and create resources to protect and preserve rare and sensitive wildlife species that are endemic to California. It is in line with the Pathways to 30x30 Report and Coastal Conservancy strategic goals to restore natural resources and engage the community in conservation initiatives. The project progresses goals in the USFWS Recovery Plan (2019) to establish suitable habitat for the recovery of wild PVBB.

**3. Project benefits will be sustainable or resilient over the project lifespan.**

The proposed project will help ensure the preservation of an endangered species. Each of the project activities will have lasting impacts essential to a sustainable future including restoration of native habitat that supports sensitive wildlife species, removal of highly flammable invasive plants which increases wildfire resilience, and creation of a native seed bank as well as expansion of native plant propagation which will ensure sustainability of plant resources for future restoration projects.

In addition, the proposed project will develop youth job training and community appreciation for landscape restoration and native plants will help sustain volunteer engagement in this work as well as availability for up-and-coming experts to assist in the future. Historically, PVPLC's volunteers remain engaged for many years, which helps sustain the ability to implement large-scale restoration projects and garner ongoing support for the conservation of open space and wildlife.

**4. Project delivers multiple benefits and significant positive impact.**

The proposed project will deliver multiple benefits including habitat enhancement, sensitive species protection, and wildfire resilience. The proposed habitat restoration will have a significant positive impact on sensitive wildlife species and reduce the risk of catastrophic wildfire impacts to communities. The project also incorporates youth job training by utilizing local Conservation Corps crews for field work.

**5. Project planned with meaningful community engagement and broad community support.**

PVPLC was started by local volunteers and has long had support from the community for their acquisition and restoration efforts. The community has donated over \$40 million over time in addition to significant funding from partner cities to pilot projects aimed at removing fuel load and restoring habitat. PVPLC has worked with multiple partners on the recovery of the PVBB including the Navy, USFWS, Moorpark College, Urban Wildlands Group, and the City. In

addition to these partners, the project is supported by elected officials including Senator Ben Allen, Congresswoman Nanette Barragan, the California Native Plant Society, and the community, including a broad base of local volunteers.

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	<b>\$5,000,000</b>
<b>Project Total</b>	<b>\$5,000,000</b>

The anticipated source of funding for this project is a Fiscal Year 2022-2023 appropriation from the General Fund to the Conservancy specifically for PVPLC to use for the purpose of “habitat restoration and wildlife mitigation in Rancho Palos Verdes.” (The Budget Act of 2022, SB 154, as amended by AB 179, Chapter 249, Statutes of 2022, as further amended by AB 100, Chapter 3, Statutes of 2023). The proposed project is consistent with this fund source because it will restore native habitat and develop resources to help preserve sensitive wildlife species.

**CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:**

The recommended project would be undertaken pursuant to Chapter 6, Sections 31251-31257 of Division 21 of the Public Resources Code (PRC), which authorizes the Conservancy to participate in coastal resource enhancement programs.

Consistent with Section 31251, the proposed authorization would award a grant to a nonprofit organization to enhance coastal resources that have become degraded due to natural and human-induced events. Climate change and urbanization have caused the spread of invasive exotic plants which are degrading native habitat areas. The proposed project consists of corrective measures that will enhance the natural and scenic character of the Preserve and improve its ability to support the federally endangered PVBB, the federally endangered El Segundo blue butterfly, the federally threatened Coastal California Gnatcatcher and the Cactus Wren, a state species of concern.

PRC Section 31251.2(a) allows the Conservancy to award a grant for a project affecting an area partly inside and partly outside the coastal zone in order to enhance coastal resources in the coastal zone. The Preserve is partly inside and outside of the coastal zone. Project activities outside the coastal zone will enhance habitat for PVBB and other species that live in the Preserve and protect the entire Preserve from invasive plant species.

PRC Section 31253 provides that the Conservancy “may provide up to the total cost of any coastal resource enhancement project.” Consistent with Section 31252, the proposed project is consistent with the certified Rancho Palos Verdes Local Coastal Plan (LCP) as requiring action to resolve existing or potential resource protection problems, as described in the Consistency with Local Coastal Program section below.

**CONSISTENCY WITH CONSERVANCY'S [2023-2027 STRATEGIC PLAN](#):**

Consistent with **Goal 3.2.1 Restore or Enhance Habitats**, the proposed project involves 342 acres of habitat restoration work that will enhance wildlife habitat and corridors for various sensitive wildlife species, including the federally endangered PVBB.

Consistent with **Goal 4.2.2 Wildfire Resilience Projects**, a local partner will implement the proposed project to improve the ecological health of natural lands and reduce the risk of catastrophic fire in areas where people live by removing 325 acres of highly flammable non-native vegetation within a very high fire hazard severity zone in proximity to residences and enhancing native habitat. The project will help California's natural lands to be more resilient to catastrophic wildfires.

**CONSISTENCY WITH LOCAL COASTAL PROGRAM:**

The proposed project is located partially within the Rancho Palos Verdes LCP area of the coastal zone. The project is consistent with the Rancho Palos Verdes Coastal Plan's Natural Environment (NE) Policies which promote habitat enhancement and protection. Specifically, the project is consistent with NE Policy #9 as it will revegetate with native plant materials where removal of non-native vegetation will occur and NE Policy #20 as it is a restoration effort designed to enhance the coastal environment.

**CEQA COMPLIANCE:**

The City, as the lead CEQA agency, has entered a contract with PVPLC to manage all conserved land in the Preserve and has determined that the invasive species removal and habitat restoration activities are addressed in two environmental impact reports (Exhibit 4). Staff has independently evaluated the two applicable CEQA documents:

- a. Final Environmental Impact Report (FEIR) for the Rancho Palos Verdes Natural Communities Conservation Planning (NCCP) Subarea Plan (Project No./SCH No. 2003071008), certified in July 2004 (NCCP FEIR).
- b. FEIR Addendum for the Rancho Palos Verdes Natural Community Conservation Plan and Habitat Conservation Plan (SCH No. 2003071008), certified in March 2018 (FEIR Addendum).

The project's vegetation removal and habitat restoration activities are analyzed in the NCCP FEIR as part of a discussion of preserve management. The FEIR identifies potential significant adverse impacts to sensitive plant and animal species and sensitive vegetation communities and habitats (Habitat Restoration Plan 3.4.5.3.1 and Targeted Exotic Plant Removal Plan 3.4.5.3.2; page 3-14 to 3-15 of the FEIR). The FEIR finds that these impacts are mitigated to a less than significant level by implementation of the NCCP/HCP and management by PVPLC. For the City of Rancho Palos Verdes subarea plan, mitigation measures include:

- Preservation of core or major populations of covered species occurring within the City.

- Design, configuration, and management of the portion of the Preserve within the City, outlined in the NCCP/HCP.
- Monitoring and reporting measures included in the annual Monitoring Report on Habitat Restoration Areas as detailed in the Habitat Restoration Plan.

All habitat areas are within the NCCP/HCP Preserve. Consistent with the City's NCCP Subarea Plan, the project is intended to benefit sensitive vegetation and wildlife communities and will carry out habitat restoration activities such as: removal of invasive, non-native vegetation and reseeded with native habitat for special species.

The project activities are also consistent with the FEIR Addendum. The grantee will perform all project activities in accordance with the City's NCCP/HCP plan which outlines Preserve Management as a Covered Activity. Specific management Covered Activities include:

- Monitoring of Covered Species
- Vehicular access
- Habitat restoration
- Invasive species control
- Predator control
- Reintroduction of Covered Species
- Photo documentation
- Installation of signage
- Trail maintenance
- Maintenance of fire/fuel buffers
- Field research and studies designed to contribute to the long-term protection of habitats and species and other basic research of habitats and species included in the Preserve.

Thus, implementation of the project is not anticipated to result in new or more severe significant impacts over and above those disclosed in the previously certified FEIR Addendum.

The proposed butterfly rearing facility is not analyzed under the CEQA documents above due to its location being outside of the Preserve. The proposed facility is categorically exempt from environmental review under CEQA pursuant to 14 Cal. Code of Reg. Section 15302, which exempts replacement or construction of existing structures and facilities where the new structure will be located on the same site and will have substantially the same purpose and capacity as the structure replaced. The location of the proposed replacement facility is a Navy owned property currently developed with various facilities in the City of Los Angeles. The current structure, which is no longer functional, will be replaced with a similar structure that will be the same size, have the same capacity, and serve the same purpose.

The seed bank element of the project is categorically exempt from environmental review under CEQA pursuant to 14 Cal. Code of Reg. Section 15301, which exempts the operation of existing public or private facilities and equipment involving negligible or no expansion of existing or former use. The seed bank work involves producing native plants and seeds in an existing plant nursery.



Upon approval of the project, Conservancy staff will file a Notice of Exemption and a Notice of Determination.