

Understanding the alternatives selected for analysis (under NEPA and CEQA) requires a full understanding of the Proposed Project. The Subarea Plan is more than a preserve area; it is a comprehensive plan that defines actions that the federal, state, and local governments and the private sector must undertake to assure the continued viability of sensitive species and the ecosystem that they depend on in Rancho Palos Verdes. These actions include land protection, habitat restoration, land management, biological monitoring, compliance monitoring, and funding of the program. It would also provide the City with incidental take authorizations. This analysis compares alternatives in terms of acres of habitat conserved, managed, and monitored. For this EIR/EA, three alternatives (including the No Project/No Action Alternative) were considered.

## **7.1 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION**

Alternatives A and B were developed during the Phase I NCCP process. Alternative A was developed from a Working Group workshop, and Alternative B evolved from an initial proposal developed by the major landowners and City. Several iterations of the landowner alternative were considered by the Working Group and Wildlife Agencies, which provided comments and concerns that resulted in modification of the alternative. These early iterations of the landowner alternative were screened from further consideration because they were considered similar to Alternative B assessed in this document. Potential alternatives that conserved less than 85 percent of existing sensitive habitat were not considered.

## **7.2 NO PROJECT/NO ACTION ALTERNATIVE**

### **7.2.1 Description**

The No Project/No Action Alternative provides decision makers the ability to compare the impacts of not approving the Proposed Project. The No Project/No Action Alternative is a continuation of the existing program for issuing take authorizations project-by-project.

Under the No Project/No Action Alternative, the existing land use and environmental regulations process would continue and be required for all public and private projects proposed in Rancho Palos Verdes. Existing regulatory practices require mitigation for impacts to sensitive species and habitats resulting in lands being set aside for open-space preservation. The configuration of preserved lands under the No Project/No Action Alternative would, however, be implemented project-by-project and be characterized, as it is currently, by fragmentation, potentially poor Reserve design or constrained habitat linkages, and isolated island preserves, resulting in increasing the risk of species decline and local extirpation. This project-by-project pattern of planning would likely occur on both public and private lands within the Subarea Plan area under the No Project/No Action Alternative. Less fragmentation could occur on public lands under the No Project/No Action Alternative because a substantial portion of these lands is already designated for open space, parks, and preserves. Public lands owned by special districts and agencies whose primary purpose is not open space or resource protection could, however, be subject to the type of piecemeal project-by-project planning that has occurred historically.

Under the No Project/No Action Alternative, a Section 10(a)(1)(B) permit would not be issued. Instead, activities involving take of listed species normally prohibited under Section 9 of the ESA would require project-specific Section 10(a) permits or Section 7 consultation if a federal nexus exists under current

ESA regulations. The Subarea Plan as proposed would not be implemented. Proposed land use designation changes necessary to implement the Subarea Plan would not be required. The No Project/No Action Alternative assumes that impacts to sensitive habitats/species would be evaluated and mitigated project-by-project, as is the present case. Under the traditional development process, several environmental regulations apply, as described below.

Environmental impact evaluations for private and public development are currently subject to land use and environmental regulations of individual jurisdictions, as well as state and federal law. Local jurisdictions provide land use regulations for conservation and preservation of environmental resources through general plans, zoning ordinances, LCPs, and specific plans, as applicable. State laws that regulate environmental resources include CEQA, the Coastal Act, and CDFG Sections 1600 and 2081 series of permits regulating impacts to wetlands and State-listed species, respectively.

The ESA allows incidental take of any species of animal federally listed as threatened or endangered to be authorized under either Sections 7 or 10 of the ESA, provided such take is unlikely to jeopardize the continued existence of an endangered or threatened species or result in adverse modification of critical habitat associated with a federal action, would not appreciably reduce the likelihood for the survival and recovery of the species in the wild, and complies with the incidental take statement in the issued Biological Opinion pursuant to Section 7 or the Section 10(a)(1)(B) permit. To obtain a permit to take a listed species under Section 10(a)(1)(B) of the ESA, the applicant must prepare an adequate habitat conservation plan. Section 2081 of the CESA also requires that a permit be obtained before take of a State-listed species. Section 404 permits are required by federal law to ensure that impacts are minimized and mitigation for individual projects that involve discharge of dredge or fill material in wetlands or other waters is identified.

By selecting this alternative, there would not be an NCCP for the City. Without the NCCP, only federal- and State-listed species would be protected under the mandates of the ESA and CESA. Habitats not occupied by a listed species would not be protected. Development and mitigation actions would continue to occur in a piecemeal fashion that historically has not conserved relatively large and interconnected preserves required to maintain species viability. No regionally coordinated funding, monitoring, or land management would occur. Riparian habitats would continue to be protected to some extent by ACOE and CDFG “no net loss” policies

### **7.2.2 Impact Comparison to the Proposed Project**

The No Project/No Action Alternative would allow development of the existing land uses pursuant to the designated land uses identified in the City’s Zoning Ordinance. More areas would be designated for development within the Reserve area boundaries under the No Project Alternative, which would result in increased impacts to biological and recreational resources when compared to the Proposed Project. Land use impacts may also increase if proposed development would conflict with preservation and conservation policies adopted by the City.

### 7.3 ALTERNATIVE A – ENVIRONMENTALLY PREFERRED ALTERNATIVE

#### 7.3.1 Description

As part of the Phase I program, interested parties from the Peninsula NCCP Working Group met in a workshop setting to develop an environmentally preferred Reserve design alternative. With the following goals in mind, Reserve Design Alternative A was developed at this workshop:

- Meet NCCP standards and issuance criteria for ESA Section 10(a) take authorizations for target species proposed to be covered by the citywide permit.
- Conserve the most practicable amount of RIHAs.
- Provide habitat linkages between patches of conserved habitat.
- Enhance/restore the most practicable amount of disturbed habitats directly adjacent to conserved habitat to enhance patch size and habitat linkage function (i.e., areas with moderate to high potential for successful restoration).
- Where feasible, provide for future economic use of private properties that support regionally important resources.

The following resource maps were made available during the planning workshop to aid in the delineation of Alternative A:

- Vegetation and target species point locations
- Regionally important habitat areas
- Slopes greater than 35 percent
- Restoration potential assessment
- Existing conserved open space areas
- Composite map of the above data layers

With these goals and resource maps, the following basic Reserve design considerations were made:

- Minimize edge effects to conserved habitat adjacent to existing and future development where practicable.
- Provide for adequate habitat linkages between conserved habitats where possible.
- Identify areas where development compatible with preserve function can be feasibly placed.
- Generally consider overall cost of land acquisition (if any), habitat restoration, and habitat management.

The resulting Alternative A is shown on Figure 7-1. Most of the undeveloped lands were included in this alternative. Figure 7-2 and Tables 7-1 and 7-2 (at the end of Section 7) compare Alternative A with Alternative C (the Proposed Project). The primary difference between Alternative A and the Proposed Project is that development is completely excluded from most of Lower Filiorum, the southern portion of Portuguese Bend, and Lower Point Vicente under Alternative A. Private property east of the Long Point site is also included in Alternative A. Relatively isolated habitat areas of public lands are not included in Alternative A.

Figure 7-1  
Reserve Design Alternatives

Insert Figure 7-2

Comparison of Alternative A and Proposed Project

Alternative A minimizes the amount of future development, resulting in 91.0 percent of existing naturalized vegetation being conserved. Alternative A includes 13.9 fewer acres of CSS habitat but 85 more acres in total compared to the Proposed Project. Alternative A is larger than the Proposed Project in proportion of conserved habitat (91.0 versus 87.4 percent), and the locations of potential future development are different. The amount of edge-affected habitat in the Reserve is similar for both Alternative A and the Proposed Project (62 versus 62.6 percent). Two additional cactus wren locations, but one less PVB location, are conserved in Alternative A. As in the Proposed Project, Alternative A conserves all key habitat linkages in the city and linkages to adjacent jurisdictions. Compared to the Proposed Project, Alternative A would have to acquire more private property (103 acres). Program costs would be approximately \$4.2 million more than the Proposed Project (Table 7-2).

### 7.3.2 Impact Comparison to the Proposed Project

Of all alternatives, Alternative A contains the largest acreage to be included in the Reserve design. Alternative A would have approximately 1,556 acres of vacant land that would have potential for inclusion in the Reserve as open space. Although land use acreages would differ between Alternative A and the Proposed Project, proposed conservation and passive recreational uses would be similar; therefore, impacts to biological resources, land use, and recreational resources would be similar to the Proposed Project.

## 7.4 ALTERNATIVE B – LANDOWNER ALTERNATIVE

### 7.4.1 Description

Subsequent to development of Alternative A, the two major landowners contributed their proposed open-space designs for their respective properties. To these designs, the City delineated the City-owned properties to be included in Alternative B (Figure 7-1). The Wildlife Agencies and Working Group provided comments on several iterations of Alternative B, which was subsequently modified within the Upper Filiorum area to produce the Alternative B used in this alternatives assessment. Figure 7-3 and Tables 7-1 and 7-2 compare Alternative B with the Proposed Project. Compared to the Proposed Project, Alternative B would allow development in Lower, Middle, and Upper Filiorum; Portuguese Bend; and Upper Point Vicente (City Hall), and excludes the open space associated with Ocean Front Estates and a portion of Shoreline Park. Alternative B would conserve 78.3 percent of existing naturalized vegetation compared to 87.4 percent for the Proposed Project. Alternative B would greatly fragment the most contiguous habitat areas and constrain habitat linkages between the larger blocks of CSS and the linkage to habitats in Palos Verdes Estates. Alternative B would result in greater take of California gnatcatcher (11 locations), cactus wren (12 locations), PVB historical locations (2 locations), and PVB habitat (22 locations). Because of the additional development areas, Alternative B has a greater proportion (76.8 versus 62.6 percent in the Proposed Project) of the Reserve area within 300 feet of existing and potential future development (edge habitat).

Insert Figure 7-3

Comparison of Alternative B and Proposed Project

A smaller portion of the Alternative B Reserve would include CSS habitat with less than 35 percent slopes, which may reduce the potential carrying capacity of California gnatcatcher breeding habitat after restoration (J. Atwood, unpublished data; Ogden, 1992a). More privately owned lands would be used as mitigation for development impacts, and less private land would need to be acquired. Alternative B program costs are approximately \$20 million less than for the Proposed Project because of potential development exactions (Table 7-1).

#### **7.4.2 Impact Comparison to the Proposed Project**

Of all of the project alternatives, Alternative B provides the smallest acreage to be included in the Reserve design. Alternative B would have approximately 1,174 acres of vacant land that would have potential for inclusion into the Reserve as open space. Although land use acreages would differ between Alternative B and the Proposed Project, proposed uses within the Reserve would be similar; therefore, impacts to land use and recreational resources would be similar to the Proposed Project. Alternative B would result in a greater impact to biological resources than the Proposed Project because of the lower acreage of conserved habitat and higher take of sensitive species. Habitat connectivity between the larger patches of conserved habitat would be more constrained and potential edge effects would be greater for Alternative B.

**Table 7-1  
Comparison of Alternative Conservation Plans, Including Cost**

	Alternative A	Alternative B	Alternative C (Proposed Project)
<b>Planning Area (Ac.)</b>			
Conserved [1]	1540.0	1,174	1,504
Neutral Lands [2]	663	663	663
Not Conserved	6,356	6,722	6,392
<i>Total Land Area</i>	<i>8,559</i>	<i>8,559</i>	<i>8,559</i>
<b>Components of Conserved Area</b>			
Dedicated for Conservation	656	458	403
Conserved for Mitigation Credit [3]	176	478	349
Additional Conservation [4]	610	165	684
<i>Subtotal Natural Habitat</i>	<i>1,442</i>	<i>1,101</i>	<i>1,436</i>
Conserved--Other [5]	98	73	68
<b>Total Conserved Area</b>	<b>1,540</b>	<b>1,174</b>	<b>1,504</b>
<b>Estimated Land Acquisition</b>			
Potential Acquisition Area (Ac.)	787	165	684
Estimated Acquisition Cost [6]	\$ 25.7 – 36.0 Mill.	\$ 5.3 – 7.5 Mill.	\$ 22.3 - 31.3 Mill.
Appraised Acquisition Cost [7]	\$30.9 Mill	\$6.5 Mill	\$26.7 Mill
<b>Management/Maintenance (x \$1000)</b>			
Start-up/One-time Cost [8]	\$ 320	\$ 244	\$ 312
Annual Cost [8]	\$ 322	\$ 246	\$ 313
<b>TOTAL PROGRAM COST [9]</b>	<b>\$ 31.6 Mill.</b>	<b>\$ 7.0 Mill.</b>	<b>\$ 27.3 Mill.</b>

SOURCE: City of Rancho Palos Verdes, Palos Verdes Peninsula Land Conservancy, URS Corporation, TAIC (2003 GIS data), Onaka Planning & Economics.

- Includes natural habitat and other areas, such as agricultural, disturbed, and developed.
- Neutral lands outside of the Reserve boundary. Includes very steep slopes and areas of open-space hazard.
- Natural habitat lands that would be conserved as mitigation for impacts of public or private development projects.
- Natural habitat to be conserved in potential acquisition areas.
- Agricultural, disturbed, and developed areas.
- Acquisition cost of land for habitat or open-space use is estimated to range from \$0.75 to \$1.05 per square foot, or an average of \$39,200 per acre. This estimate is intended for general planning use only; it is not an appraisal or estimate of site-specific value.
- City-commissioned appraisals estimated value at less than \$39,000 per acre applied to all three alternatives.
- Based on "PAR" analysis by URS Corporation and Palos Verdes Peninsula Land Conservancy for Scenario C; estimated for others.
- Sum of estimated acquisition costs and startup management cost.

**Table 7-2  
NCCP Subarea Plan Alternative Comparison of  
Habitat and Covered Species Conservation**

Resource Conserved	Existing	Alternative A		Alternative B		Alternative C (Proposed Project)	
		Conserved	Percent of Existing	Conserved	Percent of Existing	Conserved	Percent of Existing
<b>Vegetation Acreage Conserved<sup>1</sup></b>							
<b>Coastal Sage Scrub Associations</b>							
CSS – Artemisia Dominated	93.0	78.6	84.5	75.8	81.5	82.1	88.3
CSS – Baccharis Dominated	7.2	7.2	100.0	1.5	20.8	7.2	100.0
CSS – Encelia Dominated	7.9	5.6	70.9	6.8	86.1	7.9	100.0
CSS – Eriogonum Dominated	13.9	13.9	100.0	12.3	88.5	13.9	100.0
CSS – Rhus Dominated	225.0	223.5	99.3	222.9	99.1	223.4	99.3
CSS – Salvia Dominated	21.0	20.9	99.5	19.3	91.9	21.0	100.0
CSS – Undifferentiated	635.	596.1	93.8	578.1	91.0	604.0	95.1
Southern Cactus Scrub	96.9	96.3	99.4	81.6	84.2	95.8	98.9
Southern Coastal Bluff Scrub	137.0	136.2	99.4	136.1	99.3	136.1	99.3
Saltbrush Scrub	7.3	7.3	100.0	4.3	58.9	7.1	97.3
<b>Total Sage Scrub Habitats</b>	<b>1,244.7</b>	<b>1,185.6</b>	<b>95.3</b>	<b>1,138.7</b>	<b>91.5</b>	<b>1,198.5</b>	<b>96.3</b>
<b>Other Vegetation</b>							
Grassland	955.3	839.3	87.9	634.6	66.4	746.8	81.6
Riparian Scrub	2.5	2.4	96.0	2.4	96.0	2.4	96.0
Exotic Woodland	75.4	62.0	82.2	45.3	60.0	56.2	80.6
Disturbed Vegetation	88.3	64.2	72.7	32.7	37.0	64.2	72.7
<b>Subtotal Other Vegetation</b>	<b>1,121.5</b>	<b>967.9</b>	<b>86.3</b>	<b>715.0</b>	<b>63.8</b>	<b>869.6</b>	<b>80.9</b>
<b>Total Naturalized Vegetation</b>	<b>2,366.2</b>	<b>2,153.5</b>	<b>91.0</b>	<b>1,853.7</b>	<b>78.3</b>	<b>2,068.1</b>	<b>89.2</b>
<b>Other</b>							
Cliff Face	8.8	8.8	100.0	8.7	98.9	8.8	100.0
Disturbed	162.4	59.8	36.8	39.2	24.1	58.3	36.0
Agriculture	17.6	11.4	64.8	8.7	49.4	2.9	16.4
Developed	6,003.7	26.8	0.4	25.2	0.4	29.1	0.5
<b>Subtotal Other</b>	<b>6,192.5</b>	<b>106.8</b>	<b>1.7</b>	<b>81.8</b>	<b>1.3</b>	<b>99.1</b>	<b>1.6</b>

**Table 7-2  
NCCP Subarea Plan Alternative Comparison of  
Habitat and Covered Species Conservation  
(continued)**

Resource Conserved	Existing	Alternative A		Alternative B		Alternative C (Proposed Project)	
		Conserved	Percent of Existing	Conserved	Percent of Existing	Conserved	Percent of Existing
Total Acreage	8,558.7	2,260.3	26.4	1,894.0	22.1	2,167.2	25.5
<b>Target Species Locations Conserved</b>							
California Gnatcatcher	88	88	100.0	77	87.5	88	100.0
Coastal Cactus Wren	99	97	98.0	83	83.8	95	96.0
PV Blue Butterfly Historical Sightings	18	17	94.4	16	88.9	17	94.4
PV Blue Butterfly Host Plant, <i>Astragalus trichopodus</i>	84	76	90.5	57	67.9	78	92.9
El Segundo Blue Butterfly Sightings	1	1	100.0	1	100.0	1	100.0
El Segundo Blue Butterfly Host Plant, <i>Eriogonum parvifolium</i>	19	18	94.7	18	94.7	18	94.7
<i>Dudleya virens</i>	35	35	100.0	35	100.0	35	100.0
<i>Aphanisma blitoides</i>	26	26	100.0	26	100.0	26	100.0
<i>Atriplex pacifica</i>	8	8	100.0	8	100.0	8	100.0
<i>Crossosoma californicum</i>	3	3	100.0	3	100.0	3	100.0
<i>Lycium brevipes</i> var. <i>hassei</i>	3	3	100.0	3	100.0	3	100.0

1. All acreages rounded to nearest 0.1 acre.

Acreage conserved includes both Reserve Lands and Neutral Lands combined.