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Zoning Administrator, c/o Daniel Skolnick
Office of Zoning Administration
200 N. Spring Street, Room 763
Los Angeles, CA 90012
daniel.skolnick@lacity.org

Darlene Navarrete
Office of Environmental Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
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cc: Councilman Bill Rosendahl, Whitney Blumenfeld, Norman Kulla,
Joaquin Macias

Re: Application for Coastal Development Permit
Project at 16990 – 17000 Sunset Blvd, Pacific Palisades, CA 90272
ZA 2012 130, ENV 2012 131 MND

Dear Zoning Administrator and Darlene Navarrete,

I am a landscape designer commenting on need for this project and others along this section of Sunset Boulevard to protect the existing mature Torrey Pine street trees, a rare and endangered native species.

The City of Los Angeles should **act to save and preserve historic, extremely rare, aesthetically beautiful and biologically significant Los Angeles City street trees: PINUS TORREYANA / TORREY PINES along Sunset Boulevard at this site in Pacific Palisades.** The City should require an Environmental Impact Report, or at least condition any permits or Mitigated Negative Declaration, on the non-removal and preservation of these Torrey Pines and the non-disturbance of their roots and branches by grading of driveways or other disturbance.

RARE TORREY PINES:

Pinus Torreyana / Torrey Pine is the rarest native pine tree in the United States.

They are listed on <http://www.rareplants.cnps.org/detail/1379.html> by the California Native Plant Society as “CA Rare Plant Rank: 1B.2 – Rare, threatened, or endangered in California and elsewhere.” The “.2” means that they are “Fairly endangered in California.” The CNPS link notes that Torrey Pines are “Threatened by development.” CNPS states:

“All of the plants constituting California Rare Plant Rank 1B meet the definitions of Sec. 1901, Chapter 10 (Native Plant Protection Act) or Secs. 2062 and 2067 (California Endangered Species Act) of the California Department of Fish and Game Code, and are eligible for state listing. It is mandatory that they be fully considered during preparation of environmental documents relating to CEQA.”

Furthermore, the CNPS states that the State of California ranks Torrey Pines as “S1: Critically imperiled.”

Torrey Pines grow naturally only in two tiny areas of coastal California: Santa Rosa Island in the Southern California channel (off of the Santa Barbara coast) and in and around the “Torrey Pines State Natural Reserve” in La Jolla and Del Mar. That State park was created by the efforts of community organizers decades ago to save and preserve the Torrey Pines from destruction by development. It is now a very popular beach and bluff State park. Torrey Pines State Natural Reserve, www.torreypine.org - see the website tabs on Park Info, History, and Plants for further information about this rarest native pine and how/why California created this State Reserve in La Jolla.

Conifers of California, by Ronald M. Lanner, Cachuma Press, 1999. See pages 76-79 (Torrey Pine chapter):

“Not only is [Torrey pine] restricted, or endemic, to California, but it occupies only a tiny fraction of the state’s territory. In fact, Torrey pine is the rarest member of its genus in the United States. The native Torrey pine groves comprise perhaps 9,000 to 10,000 trees, all of which are concentrated in two places: a five-mile stretch of sea bluffs along the north edge of San Diego and the adjacent community of Del Mar, and the northeast side of Santa Rosa Island, about 25 miles from Santa Barbara.” p. 77.

This rarest of our native pine trees is far more endangered than any of those protected by the Los Angeles City Landscape Ordinance: native Oaks, Sycamores, Bays/Laurels, or Walnuts. Torrey Pines were probably ignored by that ordinance because their numbers within the City of Los Angeles are statistically insignificant. I speculate that any native stands here in L.A. may have been destroyed by the development of our urban sprawl, if any native stands within this City’s limits ever existed. Those trees now left standing or planted should be protected from developers, who may cut them down or kill them by root cutting and grading under their canopy.

In my landscape design practice, I have found it very difficult to find Torrey Pines at plant growers or nurseries in Southern California.

THESE ARE TORREY PINES, CITY OWNED STREET TREES:

The 30 or so Torrey Pines that grow on both sides of Sunset Blvd., from Marquez Avenue and to Pacific Coast Highway, are within the 100-foot public right of way, next to the Sunset curb, not on private property but on parkway property owned by the City of Los Angeles. These are City trees. And the City has a responsibility to protect and preserve them.

There are three (3) street trees within the public right of way of this project. I have identified them all as Torrey Pines, as have others.

Trees of Pacific Palisades, by Grace L. Heintz and other native tree experts, published by Palisades Beautiful Committee, 1986, p. 219. Torrey Pines are identified in this well-known book as street trees at this portion of Sunset Boulevard west from the Marquez Avenue's western intersection.

List of Pacific Palisades Designated Street Trees, compiled by Palisades Beautiful in cooperation of the Urban Forestry Division of the City of Los Angeles Department of Recreation and Parks, dated March 6, 2008, showing *Pinus torreyana* / Torrey Pine as the designated street tree for the stretch of Sunset from the west end of Marquez Ave. to Pacific Coast Highway.

I am told by Barbara Marinacci, current President of Palisades Beautiful, that "One of the nonprofit organization's original founders, Hilda Sauer, told me today that she believes she may have participated in planting those trees many years ago. She's now in her early 90s." She is referring to these Torrey Pines along Sunset Boulevard. Palisades Beautiful, a non-profit community organization, has been planting street trees in Pacific Palisades for about 40 years.

See the attached 1953 and 1947-48 photos of Sunset Boulevard, provided by Randy Young (Pacific Palisades historian and author), showing street trees along Sunset at the project site and beyond. These look like the younger Torrey Pines, before they were subjected to bad pruning and years of prevailing wind.

These street trees are Torrey Pines, in my opinion. See the photos of the trees on site and compare them to the photos and drawings of the Torrey Pines in the *Conifers of California* book cited above. I am a landscape designer with a certificate in Landscape Architecture from the 4 year Landscape Architecture Program at UCLA Extension, and I have been a teaching assistant to Ken Kammeyer's Plant Materials classes there (plant identification classes), as well as a former employee at the landscape architecture firm of Kammeyer & Associates.

PROPOSED PROJECT'S PHYSICAL IMPACT ON THE TREES:

The three Torrey Pines along Sunset Blvd at the project site are not shown in the attached color rendering (view from the street) or on the "2ND FLOOR PLAN/SITE PLAN @ STREET LEVEL" drawing by GMPA Architects that I have seen. Are they to be cut down and removed? If they are to remain, they should be shown on the plans and renderings, so their relationship to driveways, underground parking and other construction and grading may be assessed.

The site plan drawing shows an "open to below" between the row of newly planted trees and the building (the street side), which I am told is excavated for the under street level garage. It certainly appears that excavation for the garage and its retaining walls will be under the canopy of the Torrey Pines and thus require cutting a significant portion of their roots, endangering the life of the trees.

Any grading, storage or access ways for the project will also damage the trees, especially their roots, if done under the canopy (inside the outer drip line). See the photos of the roots cut and extracted at the property next door at 17020 Sunset Boulevard and piled up on this 16990-17000 Sunset project site, as the result of digging for a new walkway.

AESTHETICS IMPACTS:

These Torrey Pine street trees, approximately 30 of them on both sides of Sunset Boulevard in this area, are a scenic resource in themselves – as trees. They frame the views of the scenic highway Sunset Boulevard, the views of Topanga State Park (Santa Monica Mountains), views of the sky above, and at some points views of the nearby ocean and Pacific Coast Highway (see Google Maps Street View photos online). Sunset Boulevard and Pacific Coast Highway are "designated Scenic Highways."

Drive or walk that stretch of Sunset in the fog, during spectacular sunsets, or any time of day or night, under the canopy of the string of Torrey Pines along the boulevard, with those trees framing the first view of the Pacific Ocean, Will Rogers State Beach, PCH, and Santa Monica Bay, as well as the State and Federal parks and reserves of the Santa Monica Mountains (only yards away). Not many highways are more scenic, but less so without the framing of the native Torrey Pines.

No California highway is more iconic in books, song, film, TV, and the hearts of Angelenos (ok, maybe PCH too), and no highway says more about the beauty and diversity of Los Angeles than Sunset Boulevard, from downtown L.A. to the beach. At the ocean bluff end of Sunset, these Torrey Pines help to define the California Dream. Imagine cutting down or cutting the roots of Carmel's iconic Monterey Cypress?

BIOLOGICAL IMPACTS:

The rarest native pine in the USA, which only grows naturally on the coastal bluffs of the La Jolla area and a remote Channel Island, is the mature street tree on and near the project site. The Torrey Pines line both sides of Sunset Boulevard before, on, and after the project site. See the aerial photo and other photos.

There are at least 3 trailheads in Pacific Palisades into Topanga State Park, a jewel in the Santa Monica Conservancy's efforts to preserve and protect the Santa Monica Mountains from development. Topanga State Park is clearly visible from the project site. One trailhead on Paseo Miramar is not only close by, but its ridgeline path is visible from the project site. Other nearby trailheads includes those off of Palisades Drive and at Temescal Canyon Road & Sunset Blvd.

The Coastal Commission was established to protect biologically sensitive species like *Pinus torreyana* / Torrey Pine, which only grow in restricted areas of the bluffs in the coastal zone. The Torrey Pines at this project site are rare native vegetation, planted as street trees, in their native coastal bluff microclimate.

The project site's Torrey Pines are within view of open space, wilderness and wildlife habitat areas. The project is within 400 feet of the Pacific Ocean and Will Rogers State Beach. The Santa Monica Mountains wilderness – Topanga State Park – is within view across the street, a wildlife corridor and habitat. The lake at the Self-Realization Fellowship Lake Shrine Temple – yards away at the bend of Sunset at Palisades Drive – is a migratory bird stop and habitat sanctuary; the lake is fed by natural springs. The street trees on site, I presume, are habitat for migratory and nesting birds.

The City of Los Angeles, through the Mayor's office, Urban Forestry and other departments, has a policy of preserving existing street trees, requiring a permit to prune or remove them, and a policy of encouraging the planting of many more shade trees (Million Trees) along the urban parkways, for our human health, environmental health, and for natural habitat.

CONCLUSION AND RECOMMENDATION:

These rare Torrey Pines on site should be protected as heritage trees. Their existence and environmental significance should not be ignored. The cumulative environmental impact this project will have on the Torrey Pine street trees is significant. I recommend that a **full Environmental Impact Report** be required.

Failing that result, I recommend significant mitigation conditions, namely:

1. Prohibiting grading or trenching under the drip line edge of the canopy of the Torrey Pines in the parkway adjacent to the site and neighboring sites.
2. Prohibiting the removal of the Torrey Pines. And prohibiting the pruning of the Torrey Pines (roots, trunk or branches) without a written report by a licensed certified Arborist and a permit from Urban Forestry.
3. Requiring a secure barrier fence (chain link) around the drip line edge of the Torrey Pines before and during any storage or construction on site.
4. Prohibiting storage under the Torrey Pines canopy, or in those trees.
5. Prohibit driveways under the Torrey Pine canopy.
6. Prohibit hauling under the Torrey Pine canopy.
7. Require the review and approval of any plans by licensed landscape architects in the City of Los Angeles Departments of Engineering and Recreation & Parks, as well as the review and approval of the Urban Forestry Division of the Recreation and Parks Department. This includes, but is not limited to, any parking and driveway plans that the Bureau of Engineering and the Department of Transportation may review for approval.
8. Requiring the replacement of any Torrey Pines removed (if approved by the City), by 48-inch box specimen *Pinus torreyana* trees, 4 replacements for every one tree removed, to be located on site as street trees and elsewhere on site. If no Torrey Pine trees are available, requiring Owner and Developer to grow them from seed and plant them when they reach 15 gallon can size, plus a fine or fee of \$50,000 per removed tree to be paid to the City of Los Angeles, Urban Forestry division of Recreation & Parks Department.

Finally, as an advisor to Palisades Beautiful, a non-profit organization planting street trees in Pacific Palisades, I sought and received the endorsement of Palisades Beautiful for this comment letter. I have also received the support of the Marquez Knolls Property Owners Association.

Respectfully submitted,

David Card