APPEAL
From Coastal Development Permit Action
CDP Application No.: 00-05

Names and Addresses of Appellants:

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I. GROUNDS FOR APPEAL

The Urban Wildlands Group, Endangered Habitats League, Lepidoptera Research Foundation, Santa Monica Bay Audubon Society, Ballona Ecosystem Education Project, Sierra Club, Wetlands Action Network, Mandy Saner, and Bonnie Foster appeal in its entirety Coastal Development Permit No. 00-05 issued by the City of Los Angeles. The findings and conclusions adopted by the City in the approval for this permit improperly apply the resource protection standards of Chapter 3 of the California Coastal Act of 1976. We specifically contend that the project violates the provisions of Section 30240 by permitting of 90 *Washingtonia robusta* palm trees and a walkway in an environmentally sensitive habitat area (ESHA), failing to condition use of irrigation to specified seasons, and failing to require locally native propagule sources for native plant landscaping, and violates Section 30251 by failing to prohibit disruption of views along scenic coastal areas.

II. STATEMENT OF FACT

Section 30240 of the California Coastal Act states:

> Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed in those areas.

The permit findings conclude that the project site is "within an environmentally sensitive habitat area" (p. 5). Nowhere does the City dispute this fact. The report does assert "by all accounts" (without reference to sources) that the project site "is a highly ruderal area on the edge of a larger, degraded, and unrestored area of the dunes" (p. 6). Furthermore, staff states without scientific support that it is "common knowledge that a habitat area's resource value often diminishes in direct relation to proximity to developed areas, including streets. Here, even to the untrained eye, a markedly different palette of plants exists near the streets than at a greater distance from the streets" (p. 6). These comments are later used to set up a justification for allowing further degradation of the project site. However, this position contradicts data provided by The Urban Wildlands Group, and does not speak to the conditions on the project site itself. By the time the City inspected the project site, it had been graded and the native vegetation found there, including *Lupinus chamissonis, Lupinus bicolor, Camissonia cheiranthifolia, Datura wrightii, Artemisia californica,* and *Croton californicus* had been removed. These species were observed on the project site by Dr. Travis Longcore in the months prior to project implementation. Because project implementation was halted after disturbing the soil, the native seed bank has subsequently resprouted. On April 14, 2001, Dr. Longcore recorded the presence of impressive numbers of healthy specimens of *Lupinus chamissonis, Lupinus bicolor, Camissonia cheiranthifolia, Datura wrightii, Croton californicus,* and *Lotus scoparius* in the project area (Figures 2–5). These species are members of the southern dune scrub and southern foredune sensitive plant communities.

Presence of bush lupine (*Lupinus chamissonis*) also implies presence of the sensitive moth species *Comadia intrusa,* which lives in the lupine in its larval form and is found throughout the

El Segundo dunes.[1] In addition, the permit findings dismiss arthropod trapping results presented by The Urban Wildlands Group that document other sensitive arthropod species in the sections of the El Segundo dunes immediately adjacent to the project site. It is the expert opinion of Dr. Travis Longcore and Dr. Rudi Mattoni, who have published peer-reviewed scientific articles on the arthropods of the El Segundo dunes, that sensitive species would also have been found on the project site prior to its clearing by LAWA. These certainly include the El Segundo Jerusalem cricket (*Stenopelmatus* new species), and Dorothy's El Segundo dune weevil (*Trigonoscuta dorothea dorothea*).[2]

However, the presence of sensitive animal species is not necessary to invoke the protections of Section 30240, because all parties recognize that the site is an environmentally sensitive habitat area (ESHA). Staff uses the logic that lesser protections should apply to the project site because it is already degraded. Indeed, the findings state:

> At the same time, though, staff recognizes that because the project area's habitat value is already degraded, removal and replacement of the exotic species occupying the area before initiation of the Project, in itself, does not necessarily rise to the level of a "significant disruption of habitat values" (p. 7).

First, staff has no record of what species were found on the project site, because the applicant conducted no surveys. However, staff also failed to record significant vegetative cover of at least six conspicuous native plant species now easily found on the project site, which sprouted from the seed bank following the disturbance of the site. Contrary to staff's assertion that project would remove only exotic species, native dune scrub species were displaced by the project and would be displaced by completion of the project. In fact, landscaping with native species as required by the permit would displace the naturally occurring native plants now on the site if provision were not made to protect the native plants already reestablishing. Second, this argument is an interpretation of the California Coastal Act that has been rejected by the State courts. Staff does refer to a Federal document that has no bearing on state law for guidance (p. 7), but does not adhere to the interpretation of the Court of Appeal in *Bolsa Chica Land Trust v. Superior Court* 71 Cal. App. 4th 493 (1999), which is directly relevant to the protection of degraded ESHAs under Section 30240.

> Thirdly, contrary to Commission's reasoning, section 30240 does not permit its restrictions to be ignored based on the threatened or deteriorating condition of a particular ESHA. We do not doubt that in deciding whether a particular area is an ESHA within the meaning of section 30107.5, Commission may consider, among

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[1] Dr. Rudi Mattoni prepared the following description of *Comadia intrusa* for his report on the biota of the Airport Dunes (unpublished information sheet, no date): "Distinct species without subspecies. Night flying moths, readily attracted to light (and visible to UV light). Univoltine. Adults fly late June to mid July. No mouthparts as adults, so probably live only 4–5 days. Larvae exclusively feed on Dunes lupine by boring into stems and roots. Eggs are laid in mass, and hatch within one month. Larvae take several years for one generation. Sand obligate, and restricted to sand obligate plant. 1988 population numbered over 500."

[2] Recorded in the two habitat types found at project site as defined by Mattoni, Longcore, and Novotny. No traps were in the project site itself, but in similar habitats contiguous with the project site (Mattoni, R., T. Longcore, and V. Novotny. 2000. Arthropod monitoring for fine-scale habitat analysis: a case study of the El Segundo sand dunes. *Environmental Management* 25(4):445–452).

> other matters, its viability. However, where, as is the case here, Commission has decided that an area is an ESHA, section 30240 does not itself provide Commission power to alter its strict limitations. There is simply no reference in section 30240 which can be interpreted as diminishing the level of protection an ESHA receives based on its viability. ***Rather, under the statutory scheme, ESHA's, whether they are pristine and growing or fouled and threatened, receive uniform treatment and protection***.
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> *Bolsa Chica Land Trust v. Superior Court*, 71 Cal. App. 4th 493, 507–508 (1999) (emphasis added) (citations omitted).

This legal decision provides the basis for our appeal that the City erred in justifying incompatible development in an ESHA based on the "degraded" character of the ESHA. If installation of 90 palm trees would be prohibited by Section 30240 anywhere in the El Segundo dunes ESHA, it similarly must be prohibited on the project site under the clear language of the *Bolsa Chica* decision.

The construction of a walking path within an ESHA constitutes a significant disruption of habitat values. Section 30240(a) of the Coastal Act allows development within ESHAs only if the use is dependent on the ESHA's resources. The purpose of the proposed project, as reported in the Staff Report, is "to enhance the aesthetic character of the airport border" (p. 1). This goal could be achieved by enhancing the natural dunes habitat in a manner that would be consistent with Section 30240(a), but LAWA chose to pursue a landscaping scheme not based on the ESHA's natural resources. The articulated purpose of the project was aesthetic only; no mention was made of recreation or public access, yet a walkway was installed. LAWA could have met the objective of recreation or access as long as it was done in a manner that was consistent with the areas natural resources. For example, the proper design of a pathway would be as a boardwalk, which would be least disruptive to the habitat.

Furthermore, staff states unequivocally that the project site *is* an ESHA, but inappropriately uses the standard to evaluate development for areas *adjacent to* ESHAs (p. 5). Staff fails to evaluate or discuss the condition in Section 30240(a) that restricts development in ESHAs to uses dependent on those resources. The only development allowed in ESHAs are those that depend on the resource values of the ESHA. The aesthetic goals of the project are clearly not dependent on the resources of the ESHA, but rather seek to replace those resources.

Not only is the project (as designed) not a resource-dependent development that could be allowed within an ESHA, the installation of a walkway, irrigation, and 90 invasive exotic palm trees in the El Segundo dunes ESHA constitutes a significant disruption of habitat values. Many of the arguments about this impact have already been submitted and are incorporated here by reference and attached to this appeal. The facts are repeated briefly here.

Washingtonia robusta is an exotic species not found naturally occurring on or near the El Segundo dunes. Installation of *Washingtonia robusta* on the project site resulted from the removal of native plant species that support native birds and insects and compose the sensitive habitat area. In particular, *Lupinus chamissonis* is the hostplant for the sensitive moth species

Comadia intrusa, which is found throughout the El Segundo dunes. The removal of the sensitive habitat elements to install *Washingtonia robusta*, a walkway, and other landscaping constitutes a significant disruption of the pre-existing habitat values in violation of Section 30240(a) of the Coastal Act. Staff argues that because there was no "exact pre-construction inventory of site conditions" to allow them to gauge disruption of habitat values, the palms may be retained, thereby rewarding LAWA for implementing the project without conducting thorough environmental review. However, a current inventory of the site reveals the presence of native plant species characteristic of southern dune scrub and southern foredune (Figures 2–5). The habitat value of this native vegetation will be significantly disrupted if the project is allowed to proceed as proposed.

In addition to removal of native habitat to make way for installation, the presence of *Washingtonia robusta* degrades the El Segundo dunes ESHA, which is prohibited under Section 30240(a) of the Coastal Act. *Washingtonia robusta* is an invasive species, producing large quantities of seed. As documented in comments by The Urban Wildlands Group on the draft Staff Report, it invades natural habitats. Staff argued that they did not observe palms invading the dunes despite the presence of palms in the surrounding area, therefore concluding that the palms were not a threat. In the absence of a research project documenting the failure of *Washingtonia robusta* to spread in coastal dune environments, these unsystematic observations do not provide a sound basis for environmental impact analysis. To the contrary, young palms that have spread into the dunes area are readily visible on the seaward side of the dunes area. This is evident in a photograph taken on April 14, 2001 by Dr. Travis Longcore, showing three young *Washingtonia* palms at the base of one of the mature palms on the perimeter of the dunes (Figure 1).

Staff argues that "parties who expressed opposition to the trees during the public comment period failed to demonstrate how a few dozen palm trees planted beside a residential street would harm the ESB preserve or neighboring dunes any more than the palm trees that remain from the former residential development on the unrestored portions of the Airport Dunes, the dozens of palm trees along the perimeter of the Airport Dunes, or the thousands of palm trees located within a short radius of the dunes" (p. 8). This argument, at its core, is that once a habitat is being degraded, it is acceptable to further degrade it, which is clearly unacceptable in light of the *Bolsa Chica* decision. Indeed, the palms in and around the Airport Dunes produce seeds that sprout within the dune system and require control at the expense of a finite resource management budget. There can be no rational argument that it is therefore acceptable to increase that management burden and further degrade the dune system. In addition, the question for staff is whether the project significantly disrupts habitat values, not the relative harm of other pre-existing factors. Were this not the case, every development could claim insignificance in comparison with some greater harm.

Staff further argues that "because LAWA works diligently to eliminate non-native species from the ESB preserve, it is unlikely that palms would persist on the preserve" (p. 8). However, the dunes ESHA in and adjacent to the project site is not managed as a preserve, nor are any actions taken to prevent degradation by non-native species. Also, suggesting that management would prevent invasion tacitly acknowledges that the palms *would* invade in the absence of management, contrary to the previous assertion. There is therefore ample evidence to conclude

that the palms would produce seeds and seedlings on the El Segundo dunes ESHA in the project site and adjacent to it, where no resource management is undertaken by LAWA.

The palm trees also provide perch sites for urban adapted birds (e.g., starlings) and can harm local native bird, mammal, and reptile communities by providing roosting vantage points for raptors. This could affect such sensitive species as the Coast Horned Lizard (*Phrynosoma coronatum*). Again, the argument that other palm trees exist on the dunes is irrelevant to this determination. As discussed above, existing degradation is no argument for further degradation of a habitat under the Coastal Act.

The use of permanent irrigation would significantly degrade the El Segundo dunes ESHA. Staff avoids addressing this concern by declaring it moot. Staff asserts that because the project is conditioned to use native plant species, irrigation will not be used after plants are established. However, without a project condition, there is no assurance that proper irrigation schedules would be maintained, promoting the increase of exotic arthropod abundance in the project site and the adjacent dunes habitat. Water sources promote population increases of non-native Argentine ants, European earwigs, and other exotic species, which displace native insect species, an effect that has recently been documented to extend 200 m into native habitats.[3] Argentine ants may be found in small numbers across the project site already, but the explosion in numbers associated with permanent irrigation will wreak havoc on native arthropod communities. This is shown by consistent decreases in native arthropod diversity in response to increased Argentine ant abundance.[4] Argentine ants would displace native ants surrounding the project site. This extirpation reverberates up the food chain, as some native reptiles (i.e., Coast Horned Lizard, found on the El Segundo dunes) preferentially feed on native ants and decline in their absence.[5]

The permit does not include a restriction for the use of locally native propagule sources for native species included in the landscaping for the project. The California Coastal Commission regularly requires that applicants use locally native seed sources, when feasible, for revegetation with native plants. Staff's argument that The Urban Wildlands Group failed to demonstrate the need to use local propagule source provides no substantive discussion or rationale why this regular practice should be ignored. The dangers of nonlocal sources were clearly articulated in a published scientific article submitted by The Urban Wildlands Group ("On the Perils of

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[3] Holway, D. A. 1998. Factors governing rate of invasion: a natural experiment using Argentine ants. *Oecologia* 115(1-2):206–212. Suarez, A. V., D. T. Bogler, and T. J. Case. 1998. Effects of fragmentation and invasion on native ant communities on coastal southern California. *Ecology* 79(6):2041–2056.

[4] Erickson, J. M. 1971. The displacement of native ant species by the introduced Argentine ant *Iridomyrmex humilis* (Mayr). *Psyche* 78:257–266. Cole, B. J. 1983. Assembly of mangrove ant communities: patterns of geographic distribution. *Journal of Animal Ecology* 52:339–348. Human, K. G., and D. M. Gordon. 1996. Exploitation and interference competition between the invasive Argentine ant, *Linepithema humile*, and native ant species. *Oecologica* 105(3):405–412. Human, K. G., and D. M. Gordon. 1997. Effects of Argentine ants on invertebrate biodiversity in Northern California. *Conservation Biology* 11(5):1242–1248. Holway, D. A. 1998. Effect of Argentine ant invasions on ground-dwelling arthropods in northern California riparian woodlands. *Oecologia* 116(1-2):252–258. Kennedy, T. A. 1998. Patterns of an invasion by Argentine ants (*Linepithema humile*) in a riparian corridor and its effects on ant diversity. *American Midland Naturalist* 140(2):343–350. Longcore, T. R. 1999. Terrestrial arthropods as indicators of restoration success in coastal sage scrub. Ph.D. Thesis, Department of Geography, University of California, Los Angeles.

[5] Suarez, A. V., J. Q. Richmond, and T. J. Case. 2000. Prey selection in horned lizards following the invasion of Argentine ants in southern California. *Ecological Applications* 10:711–725.

Ecological Restoration: Lessons from the El Segundo Blue Butterfly").[6] We here call attention to two other scientific articles showing that nonlocal ecotypes do not survive as well as local individuals, and that breeding between local individuals and others from geographically and environmentally dissimilar sites results in offspring less adapted to local conditions.[7] As described in these three articles, the hazard of using genetically dissimilar plant populations is from outbreeding depression resulting from interbreeding between nonlocal and local individuals, and from harm done to herbivorous species (insects) that have coevolved with local populations. Furthermore, staff again relies on the argument that because the site is degraded, restrictive conditions should not be applied, in contradiction of the *Bolsa Chica* decision.

The project will encourage use of a sensitive habitat area by pedestrians and pets. Residents near to the project have observed dog owners allowing their dogs to roam off-leash through the project site. On April 14, 2001, Dr. Travis Longcore documented dog waste in the sand at the base of one of the newly-installed palm trees on the project site (Figure 6). Regardless of whether staff observed this phenomenon, the project should be conditioned to provide for mitigation for increased impacts by domestic animals. For example, a pedestrian path along the Ballona Lagoon provides baggies and disposal sites for pet owners to clean up after their pets.

Section 30251 of the Coastal Act requires that "development shall be sited and designed to protect views to and along the ocean and scenic coastal areas" and shall "be visually compatible with the character of surrounding areas…." The installation of 90 palm trees along the edge of a dune habitat degrades the natural visual quality of that dune area. Despite the remaining scattered palm trees in the ex-residential portion of the dunes adjacent to the project site, the palm forest installed as part of the project is not compatible with the visual quality of the dunes landscape. Furthermore, views to the ocean from the public thoroughfare and public park adjacent to the project site are blocked by the 90 trees, which form a line stretching toward the ocean. Staff argues that since the site lies between residences and vacant land, the project is "visually compatible." This position overlooks the distance of the residences from the dune area; in most locations the dunes and the residences are separated by a wide street. The palm forest allowed by the permit introduces a dense line of trees into a naturally treeless area, and evokes Palm Springs more than a coastal dune system.

Finally, it must be noted that earlier comments by The Urban Wildlands Group were misinterpreted in the Staff Report. The Urban Wildlands Group in its comments on the draft Staff Report did not intend to assert that LAWA should be forced to restore the project site to its natural state, only that LAWA be responsible for restoring the site *to its previous condition* if the project permit is not ultimately granted. Such requirement would not constitute a punitive sanction but a common procedure involved ensuring compliance with the Coastal Act. To act

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[6] Longcore, T., R. Mattoni, G. Pratt, and C. Rich. 2000. On the perils of ecological restoration: lessons from the El Segundo blue butterfly. Pp. 281–286 in *2nd Interface Between Ecology and Land Development in California*, edited by J. E. Keeley, M. Baer-Keeley and C. J. Fotheringham. U.S. Geological Survey, Sacramento, CA.

[7] Montalvo, A. M., and N. C. Ellstrand. 2000. Transplantation of the subshrub *Lotus scoparius*: testing the home-site advantage hypothesis. *Conservation Biology* 14(4):1034–1045. Montalvo, A. M., and N. C. Ellstrand. 2001. Nonlocal transplantation and outbreeding depression in the subshrub *Lotus scoparius* (Fabaceae). *American Journal of Botany* 88(2):258–269.

otherwise would encourage applicants to disregard the Coastal Act, construct projects and seek after-the-fact permission, as did LAWA in this instance.

III. SUMMARY OF ISSUES

In sum, based on the scientific evidence and expert opinion presented here and attached, we appeal the decision that the project as conditioned is in compliance with Sections 30240 and 30251 of the Coastal Act. We dispute conclusions raised about the impacts of the proposed project to Coastal Zone resources, namely the degradation of the El Segundo dunes ESHA. We argue, based on fact, scientific evidence, and relevant court decisions, that the permit conditions should not allow retention of the 90 palm trees illegally installed by LAWA, and that other steps, such as the use of local ecotypes, should be required to prevent significant disruption of the El Segundo dunes ESHA over the long term.

FIGURES

1) Three *Washingtonia* palms invading dunes ESHA from mature trees on Vista del Mar.

2) *Camissonia cheiranthifolia* and *Lupinus chamissonis* reestablished on disturbed project area.

3) *Lupinus chamissonis* growing in foredune portion of project area.

4) *Lupinus bicolor* growing in backdune portion of project area.

5) *Lotus scoparius* and *Datura wrightii* growing under newly-installed palm.

6) Dog feces in sand at base of newly-installed palm; *Camissonia cheiranthifolia* in foreground.

REQUIRED ATTACHMENTS

A. List of persons who spoke, or submitted testimony at the public hearing

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B. List of persons known to have an interest in the matter

None known to appellants at this time.

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March 5, 2001

Environmental Group
Att'n: Jim Doty
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Re: Waterview Street Landscaping Project (CDP-00-05)

Dear Mr. Doty:

The Urban Wildlands Group is dedicated to the conservation and enhancement of natural habitats in urban and urbanizing areas, seeking to protect and restore biodiversity through restoration, research, and education. The organization has an ongoing interest in the protection of biological resources of the El Segundo dunes, and presents these comments on the proposed landscaping project. In addition to the cited sources included in the letter, these comments draw on the experience and expert scientific opinions of Dr. Rudi Mattoni and Dr. Travis Longcore, both of whom have published scientific research articles on the ecology and management of the El Segundo dunes and adjacent habitats.

Despite Partially Completed Construction, Project Must Be Analyzed on Own Merits

Los Angeles World Airports (LAWA) is applying for an after-the-fact permit for a landscaping project that is already partly completed. This unfortunate situation could have been avoided. The Urban Wildlands Group requested on December 13, 1999 to review the landscaping plans, specifically the plant list, prior to the commencement of installation. In making the request, The Urban Wildlands Group informed LAWA project director Intissar Durham of our concern about the ecological appropriateness of the plant palette for a project in such an ecologically sensitive area, with the general comment that the project should avoid use of invasive exotic plant species. LAWA did not follow through on the promise to allow review of the plant list and started the project. When members of The Urban Wildlands Group viewed the project in progress, we contacted the California Coastal Commission, who informed LAWA that a Coastal Development Permit was required for the project. This background is relevant to illustrate that LAWA was aware of concern over the plant palette for the proposed project, chose to ignore that concern, and failed to secure the proper permits. We are therefore concerned about the prospect of LAWA receiving special consideration to allow the installed portion of the project to remain. Regardless of the illegal prior action, the environmental review must analyze the project on its own merits, and LAWA must be responsible for restoring the landscape to comply with the Chapter 3 policies of the California Coastal Act.

Project Does Not Comply with Section 30240 of California Coastal Act

Staff correctly notes that the project lies within an Environmentally Sensitive Habitat Area. The applicant could easily have made this determination by consulting the City of Los Angeles CEQA Guidelines, which illustrate that the project site is within a County of Los Angeles Significant Ecological Area. This site is also within a Recovery Unit designated by the United States Fish and Wildlife Service Recovery Plan for the El Segundo blue butterfly. In addition to these readily available documentary sources, a survey of the project site would have resulted in discovery of native plants characteristic of southern dune scrub (e.g., *Artemisia californica*, *Lupinus chamissonis*) and southern foredune (e.g., *Ambrosia chamissonis, Croton californicus, Lupinus chamissonis, Abronia umbellatum, Camissonia cheiranthifolia*). Both of these habitats are recognized as sensitive natural communities by the California Department of Fish and Game (DFG).[1]

LAWA did not conduct any biological surveys before starting construction, rather relying on Mattoni's 1990 report for this *post hoc* permit application.[2] In the absence of contradictory information, LAWA incorrectly completed the California Coastal Commission permit application Question 9, which asks, "Is the proposed development in or near: a. Sensitive habitat areas (Biological surveys may be required), b. Areas of state or federally listed rare, threatened, or endangered species." LAWA's response to both of these questions was "No" with a note that the site was half a mile from habitat of an endangered species. These responses are factually incorrect, and it is difficult to believe that LAWA did not know it. The 1990 Mattoni report — clearly in LAWA's possession — provides adequate information for the determination that the project site is a sensitive habitat area (southern dune scrub, foredune scrub), and in an area of state-recognized rare species (e.g., several of the arthropod species endemic to the El Segundo dunes). Further unpublished data that were analyzed in Mattoni et al. show rare arthropod species in the areas of the dunes that include the project site.[3] The record is clear that the project site is an environmentally sensitive habitat area, and that LAWA should have known so prior to illegal implementation of the project. Furthermore, Dr. Travis Longcore informed both LAWA project director Intissar Durham and LAWA environmental compliance specialist Steve Crowther that the project site was an environmentally sensitive habitat area.

The argument that the project site is not an ESHA because it is in the site of a former residential area is incorrect. Despite a history of residential occupation, the current conditions at the project site clearly indicate presence of plant species indicative of southern foredune scrub, backdune, and Los Angeles coastal prairie. The prairie portion is degraded, but representative plant species

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[1] California Department of Fish and Game Natural Diversity Database. 1999. Special Status Plants, Animals, and Natural Communities of Los Angeles County.

[2] The attachments to the permit application are largely derivative of Mattoni, R. 1990. Species diversity and habitat evaluation across the El Segundo sand dunes at LAX. Report to Los Angeles Department of Airports. However, the maps rename the backdune areas characterized as "Oakley Sand" by Mattoni, and shown to be part of the historic distribution of the Los Angeles Coastal Prairie by Mattoni and Longcore as "non-dune area." (*See* Mattoni, R., and T. R. Longcore. 1997. The Los Angeles Coastal Prairie, A Vanished Community. *Crossosoma* 26(2):71–102.) This name change serves to obscure the resource value of the Oakley Sand area and the associated presence of sensitive animal species in this portion of the project site.

[3] Mattoni, R., T. Longcore, and V. Novotny. 2000. Arthropod monitoring for fine scale habitat analysis: a case study of the El Segundo dunes. *Environmental Management* 25(4):445–452.

are present. In addition, although the arthropod communities of these sites are not identical to undisturbed dune areas, they do contain rare arthropod species (as recognized by DFG) and therefore constitute a sensitive habitat area (see Appendix).

Project Disrupts Habitat Values of Environmentally Sensitive Habitat Area

Staff notes that the California Coastal Act requires developments to "where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources." Staff then concludes that it is feasible to achieve project goals of a landscaped buffer by using native rather than exotic species. We concur with this conclusion. However, we fail to understand Staff's logic in allowing LAWA to retain the *Washingtonia robusta* already planted. Staff does not supply any code section justifying this decision, nor any discussion of how *Washingtonia robusta* differs from any of the other exotic plant species proposed for the site. This decision is arbitrary, and apparently based on a desire not to cause undue burden to the applicant to remove plants already installed. However, the Coastal Act does not provide for such allowance in its statutes. The analysis of the project must be of the project as a whole, regardless of work already completed. We strongly support Staff's conclusion that the project must use appropriate native plants for the landscaping. However, we disagree with Staff's recommendation that the installed *Washingtonia robusta* be allowed to remain. The current Staff analysis does not provide a justification under the California Coastal Act for treating installed *Washingtonia robusta* differently from all other exotic plants, nor does it provide evidence that *Washingtonia robusta* does not degrade the habitat values of the ESHA given the apparent conclusion that the other exotic plant species do so. We believe that the project condition for native plants must extend to the installed *Washingtonia robusta* (i.e., require their removal) to comply with Section 30240 of the California Coastal Act.

In addition to the information presented in the staff report, we would like to provide additional comments in support of a modified staff recommendation on the disruption of habitat values that would be caused by the proposed project. The disruption of habitat values by the proposed project would result from two features: installation of invasive exotic plants, and installation of a permanent irrigation system. Both of these project components significantly degrade the habitat values on the EHSA on the project site itself and degrade habitat values in the ESHA adjacent to the project site.

Exotic Plants Degrade Project Site ESHA, Pose Invasion and Hybridization Risk for Adjacent ESHA

As communicated to LAWA, Staff and the California Coastal Commission, nearly the entire plant palette for the proposed project is either an invasive exotic species, or would pose a hybridization risk to the native species in and adjacent to the project site. These impacts would degrade the ESHA on the project site as well as the adjacent ESHA area in violation of Section 30240 of the California Coastal Act. We offer specific comments on the proposed species list as follows.

Washingtonia robusta (Mexican Fan Palm) — Invasive, spreads by seeds. This is the most invasive of the palms. It has large seed set and sprouts readily.[4]

Agavae attenuata (Foxtail Agave) — Probably not an invasive risk, but not native to the dunes.

Aloe vera (Medicinal Aloe) — Probably not an invasive risk, but not native to the dunes.

Phormium tenax variegatum (Variegated New Zealand Flax) — Might be invasive, not native.

Yucca aloifolia (Variegated Spanish Bayonet) — Probably not invasive, but not native.

Lonicera japonica (Hall's Honeysuckle) — Definitely invasive.

Salvia sonomiensis (Dora's Choice Sprawling Sage) — Hybridization risk with native sages. Could invade.

Erigeron karinskianus (Santa Barbara Daisy) — Not native.

Oenothera berlandieri — Not native.

Santolina chamaecyparissus (Lavender Cotton) — Not native.

Scaevola "Mauve Cluster" (Mauve Cluster Scaevola) — Not native.

Camissonia chieranthifolia (Beach Evening Primrose) — Native, but should use local seeds to preserve ecotype specificity of dunes population.

Ceanothus griseus (Trailing Cenanothus) — Not native.

Cistus purpureus (Orchid Rockrose). Not native. Could invade.

Convolvulus cneroun and *mauritacnicus* (Morning Glory) — Not native. Poses hybrization risk to native *Convolvulus* [=*Calystegia*], which hybridizes easily.

Coreopsis grandiflora — Not native.

Lantana spp. (Lantanas) — Not native, invasive.

Lavendula stoechas (Spanish Lavender) — Not native.

Myoporum "Pacificum" — Not native, pernicious invasive. On California Exotic Pest Plant Council list, *Exotic Pest Plants of Greatest Ecological Concern in California*.

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[4] Washington Fan Palm invaded Peñasquitos Canyon Preserve in San Diego County from adjacent residential subdivisions, which required removal at considerable expense. See California Exotic Pest Plant Council. 1997. *CalEPPC News*. 5(1):1.

Salvia greggii (Autumn Sage) — Not native, hybridization risk.

Rosmarinus officinalis (Rosemary) — Not native, doesn't tend to spread, but persists.

Bougainvillea spectabilis (Bouganvillea) — Not native.

Native plants used in the landscaping project should be propagated from locally native sources (e.g., elsewhere on the El Segundo dunes). Inappropriate sources for native plant species can result in outbreeding depression in hybrid offspring with local individuals. This is the equivalent of the plant losing its "home field advantage" — the local adaptations that allow it to thrive under a particular set of local environmental conditions.[5] Furthermore, non-local ecotypes are not co-adapted with herbivorous insect species and can potentially kill native insect species.[6] We therefore request that the project condition be modified to specify locally native propagule sources for the native landscaping.

Permanent Irrigation Itself Degrades ESHA

Installation of permanent irrigation at the project site would result in an expansion of the invasive exotic arthropod community on and adjacent to the project site. Water sources promote population increases of non-native Argentine ants, European earwigs, and other exotic species, which displace native insect species, an effect that has recently been documented to extend 200 m into native habitats.[7] Argentine ants are probably found in small numbers across the project site already, but the explosion in numbers associated with permanent irrigation will wreak havoc on native arthropod communities. This is shown by consistent decreases in native arthropod diversity in response to increased Argentine ant abundance.[8] Argentine ants would displace native ants surrounding the project site. This extirpation reverberates up the food chain, as some native reptiles (i.e., Coast Horned Lizard, found on the El Segundo dunes) preferentially feed on native ants and decline in their absence.[9]

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[5] Montalvo, A. M., and N. C. Ellstrand. 2000. Transplantation of the subshrub *Lotus scoparius*: Testing the home-site advantage hypothesis. *Conservation Biology* 14(4):1034–1045.

[6] Longcore, T., R. Mattoni, G. Pratt, and C. Rich. 2000. On the perils of ecological restoration: lessons from the El Segundo blue butterfly. Pp. 281–286 in *2nd Interface Between Ecology and Land Development in California*, edited by J. E. Keeley, M. Baer-Keeley and C. J. Fotheringham. U.S. Geological Survey, Sacramento, CA.

[7] Holway, D. A. 1998. Factors governing rate of invasion: A natural experiment using Argentine ants. *Oecologia* 115(1-2):206–212. Suarez, A. V., D. T. Bogler, and T. J. Case. 1998. Effects of fragmentation and invasion on native ant communities on coastal southern California. *Ecology* 79(6):2041–2056.

[8] Erickson, J. M. 1971. The displacement of native ant species by the introduced Argentine ant *Iridomyrmex humilis* (Mayr). *Psyche* 78:257–266. Cole, B. J. 1983. Assembly of mangrove ant communities: patterns of geographic distribution. *Journal of Animal Ecology* 52:339–348. Human, K. G., and D. M. Gordon. 1996. Exploitation and interference competition between the invasive Argentine ant, *Linepithema humile*, and native ant species. *Oecologica* 105(3):405–412. Human, K. G., and D. M. Gordon. 1997. Effects of Argentine ants on invertebrate biodiversity in Northern California. *Conservation Biology* 11(5):1242–1248. Holway, D. A. 1998. Effect of Argentine ant invasions on ground-dwelling arthropods in northern California riparian woodlands. *Oecologia* 116(1-2):252–258. Kennedy, T. A. 1998. Patterns of an invasion by Argentine ants (*Linepithema humile*) in a riparian corridor and its effects on ant diversity. *American Midland Naturalist* 140(2):343–350. Longcore, T. R. 1999. Terrestrial arthropods as indicators of restoration success in coastal sage scrub. Ph.D. Thesis, Department of Geography, University of California, Los Angeles.

[9] Suarez, A. V., J. Q. Richmond, and T. J. Case. 2000. Prey selection in horned lizards following the invasion of Argentine ants in southern California. *Ecological Applications* 10:711–725.

For the reasons discussed above, The Urban Wildlands Group requests that the project be conditioned to: 1) allow only locally native plant species to be used for landscaping, 2) prohibit permanent irrigation in the project site, and 3) require that LAWA remove the installed *Washingtonia robusta*.

Sincerely,

Catherine Rich, J.D., M.A.

Travis Longcore, Ph.D.

Appendix

Arthropods Collected in Pitfall Traps 1988, 1992–1993. Percentage of total standardized for trapping effort in each habitat. Unpublished appendix to Mattoni et al. (2000).

		Foredune			Backdune		Prairie	
Species	N	Exresidential	Sandminded	Undisturbed	Disturbed	Undisturbed	Meadow	Oakley Sand
Amphidora nigropilosa	6241	11.9	1.75	9.53	1.28	11.73	19.64	44.18
Iridiomyrmex humilis	5042	14.99	8.48	30.71	5.92	12.03	14.43	13.43
Entomobryid sp. 1	3553	6.37	0.3	11.17	1.78	3.1	60.4	16.89
Forficula auricularia	3224	11.17	0.2	4.27	5.28	2.55	8.5	68.03
Sarcophagid sp. 2	3070	6.99	8.45	23.47	33.5	9.48	10.81	7.29
Heleomyzid sp. 1	3012	12.47	3.54	38.82	7.57	13.67	8.31	15.63
Spirobolid sp. 1	2666	6.55	1.78	71.19	1.8	13.01	2.47	3.2
Pogonomymex californica	2013	13.33	10.07	18.75	5.34	0.53	7.5	44.48
Machilid sp. 1	1599	11.93	10.56	19.17	8.36	13.34	7.21	29.43
Eleodes gracilis	1595	6.84	2.3	7.02	1.96	3.8	36.67	41.41
Formica piliformis	869	0.03	99.97	0	0	0	0	0
Calathus ruficollis	868	21.9	0.1	3.75	2.5	2	51.4	18.34
Machilid sp. 2	802	9.49	17.29	26.4	32.82	8.76	2.39	2.83
Trigonoscuta sp.	750	11.47	10.27	33.95	22.68	5.58	3.64	12.4
Sarcophagid sp. 3	717	8.21	7.13	38.71	3.23	35.36	4.12	3.23
Alloniscus sp.	630	7.27	2.64	10.19	51.27	9.12	11.74	7.77
Anthomyid sp. 1	588	6.04	14.32	31.45	8.96	13.54	5.24	20.45
Lycosid sp. 1	561	21.56	18.45	23.52	12.81	9.08	5.88	8.7
Sarcophagid sp. 1	487	11.54	14.05	25.58	8.89	12.76	6.25	20.93
Uta sp.	477	8.92	11.58	33.3	11	17.9	14.39	2.9
Agelenid sp. 1	437	13.1	7.83	36.17	5.82	19.21	4.63	13.23
Vejovid sp.	407	3.32	12.96	34.61	11.16	9.34	17.83	10.78
Lycosid sp. 2	403	11.64	23.41	16.34	9.39	17.75	9.98	11.49
Dolichopodid sp.	382	1.17	23.27	31.95	0	34.15	9.46	0
Arenivaga sp.	350	2.7	11.65	9.64	10.18	9.01	12.88	43.94
Sarcophagid sp. 5	292	12.14	22.19	14.66	20.94	14.49	7.2	8.38
Psilichorus sp.	253	11.22	23.92	11.01	7.41	20.42	10.16	15.87
Coniontus affinis	215	8.74	0	0.55	0	0.99	6.95	82.77
Lutica sp.	209	2.36	8.15	65.3	13.85	8.8	1.55	0
Pterostichus sp.	196	4.82	1.26	3.78	2.29	40.48	39.68	7.68
Eremobates sp.	188	12.46	6.4	13.24	5.19	6.83	15.48	40.4
Tepulid sp. 1	177	1.81	1.62	11.58	1.25	3.92	23.79	56.04

Stenopelmatus sp.	175	9.18	7.46	21.22	19.12	9.56	23.9	9.56
Rhacocnemis sp.	143	2.28	0	1.17	0.71	2.14	1.17	92.53
Maurtanicus sp.	141	7.12	4.71	13.49	0	23.66	29.77	21.25
Armadillidium sp.	137	96.61	0	0	0	0	3.39	0
Phorid sp. 1	130	10.52	3.64	19.67	1.97	23.21	4.92	36.09
Eleodes omissa	127	45.28	1.26	13.84	0	2.2	16.35	21.07
Calliphorid sp. 2	127	6.46	4.92	36.72	22.56	17.13	12.21	0
Amara californica	125	12.46	0.56	3.5	2.8	0	38.66	42.02
Xysticus sp.	123	9.1	4.3	6.7	1.65	1.08	8.27	68.9
Cicadellid sp.	121	6.67	3.22	10.28	7.85	1.41	5.18	65.38
Bombyliid sp.	118	18.36	20.66	17.93	8.61	10.47	23.96	0
Coelus ciliatus	104	14.71	13.16	39.94	18.58	8.98	4.64	0
Emblethis sp.	96	19.35	5.42	7.96	3.62	5.97	3.44	54.25
Phalangid sp. 1	89	18.49	0	0	0	5.88	19.54	56.09
Anthomyiid sp. 2	85	2.26	9.39	29.33	34.3	20.04	1.71	2.98
Collops sp.	83	10.21	2.89	15.03	3.85	2.5	33.33	32.18
Sphaeropthalma sp. 1	80	9.76	11.28	26.46	4.34	1.52	10.41	36.23
Hylocrinus sp.	78	13.85	0.38	1.05	1.91	1.81	4.58	76.41
Lithobius sp.	78	4.09	0	0	39.72	14.72	18.11	23.36
Gnaphosid sp. 1	72	6.63	7.67	46.29	7.8	12.61	1.69	17.3
Ptinus fur	72	1.79	20.38	43.23	0	33.59	1.01	0
Serica sp.	63	5.51	4.66	18.22	0	6.99	22.25	42.37
Philodromus sp.	55	11.42	17.99	15.22	34.6	7.61	13.15	0
Psocid sp.	53	39.58	10.62	0	3.86	14.48	5.79	25.68
Anthomyiid sp. 3	48	3.26	31.25	11.96	10.87	42.66	0	0
Cratidus sp.	47	9.91	0	3.3	0	12.01	24.62	50.15
Oxyopid sp. 1	46	13.07	10.6	42.05	21.2	2.83	10.25	0
Trombidium sp. 1	41	3.41	16.38	35.15	0	45.05	0	0
Ogerius sp.	39	9.97	24.05	42.96	6.87	15.12	1.03	0
Chiracanthum sp.	38	0.74	10.84	64.29	0	21.67	2.46	0
Anchomma costatum	37	2.6	1.04	6.51	0	46.09	9.11	34.64
Gnaphosid sp. 2	37	7.91	5.37	0	5.65	0	5.65	75.42
Melanopleurus sp.	36	1.03	0	75.04	0	1.2	0	22.74
Geocoris sp.	35	7.46	16.42	0	0	12.94	13.43	49.75
Ipochus sp.	34	7.41	0	19.66	5.7	3.7	6.55	56.98
Sarcophagid sp. 4	34	1.6	3	93.4	0	1.4	0.6	0
Trombidiid sp. 4	34	12.62	1.94	27.18	9.71	3.4	12.62	32.52
Aphididae sp.	33	18.1	12.93	20.26	8.62	5.6	5.6	28.88
Mythicomyia sp. 1	33	0	12.26	6.81	0	80.11	0.82	0
Cycloptilum sp.	30	14.39	42.44	8.12	7.38	26.57	1.11	0
Salticid sp.	30	47.09	25.11	11.21	0	12.56	4.04	0
Tephritid sp.	30	70.88	0	27.47	0	0	1.65	0
Xerosaprinus sp.	29	6.52	11.3	29.13	17.39	14.35	6.96	14.35
Coelus globosus	28	6.01	10.38	72.68	10.93	0	0	0
Trombidiid sp. 3	28	10.17	0	0	0	6.21	27.12	56.5
Rhinotermes sp.	26	53.07	14.53	6.15	0	6.15	1.68	18.44

Dysdera crocata	25	5.32	5.04	28.01	39.22	13.17	0	9.24
Cercopid sp. 1	23	13.99	18.18	30.77	0	4.9	9.09	23.08
Porcellio sp .1	23	1.33	0	2.08	0	1.33	0.57	94.7
Elaterid sp. 2	22	1.58	5.93	4.35	0	0	22.13	66.01
Rhigopsis	22	0	0	10.58	0	0	89.42	0
Elaterid sp. 1	20	10.42	0	0	0	13.54	76.04	0
Hippodamia convergens	18	14.58	22.92	0	0	0	62.5	0
Coccinella sp.	18	11.58	10	0	0	0	8.42	70
Conomyrma sp.	17	0	47.52	0	0	7.92	11.88	32.67
Sphaeropthalma sp. 2	17	40.38	0	21.15	38.46	0	0	0
Latrodectus hesperus	17	17.86	0	9.82	0	28.57	14.29	29.46
Pompilius sp.	16	1.41	7.75	3.87	14.08	0	2.46	70.42
Garrypus sp.	15	3.48	3.48	31.3	0	16.52	16.52	28.7
Epantius sp.	15	4.17	8.93	19.64	47.62	0	0	19.64
Sarcophagid sp. 6	15	1.22	40.24	30.49	0	24.39	3.66	0
Scaphiella sp.	15	5.13	0	73.5	0	5.98	15.38	0
Anthomyiid sp.	15	0	0	50	0	17	33	0
Monomerium minimum	14	0	36.14	39.76	0	8.43	15.66	0
Cleonidius sp.	14	3.33	0	37.22	44.44	15	0	0
Tachinid sp. 2	14	21.62	0	0	0	44.59	33.78	0
Arctiid sp.	14	80	0	0	0	0	20	0
Staphylinid sp.	13	3.09	4.12	0	41.24	31.96	19.59	0
Mordellid sp.	13	3.6	23.74	17.99	14.39	35.97	4.32	0
Agonum sp.	12	0	0	0	0	0	0	100
Cydnid sp.	11	0	0	64.94	0	3.03	3.03	29
Dryinid sp. 2	11	17.46	14.29	8.73	0	6.35	0	53.17
Nyctoporis sp.	11	13.71	0	0	0	0	5.65	80.65
Tiphiid sp. 2	10	0	30.23	0	23.26	0	8.14	38.37
Lathriid sp.	10	5.56	0	27.78	22.22	31.11	13.33	0