

THE URBAN WILDLANDS GROUP, INC.

P.O. BOX 24020, LOS ANGELES, CALIFORNIA 90024-0020, TEL (310) 276-2306

August 4, 2003

The Honorable Cindy Miscikowski
Councilwoman, Eleventh District
Los Angeles City Council
200 North Spring Street, Room 415
Los Angeles, California 90012

Re: Future of the El Segundo dunes at LAX

Dear Councilwoman Miscikowski:

I would like to bring to your attention an issue of longstanding interest to The Urban Wildlands Group, the nonprofit organization that I co-founded in 1996 and which we incorporated in 1999. Our organization is dedicated to the conservation of species, habitats, and ecological processes in urban and urbanizing areas. We see an outstanding opportunity to address conservation goals at the portion of the El Segundo dunes located at the Los Angeles International Airport (LAX); the purpose of this letter is to articulate a vision to protect and restore the abundant natural values of this unique dune ecosystem.

The El Segundo dune complex at LAX is one of the most important and high profile wildlife habitats within the City of Los Angeles. The dunes are the remaining heart of a once vast system; they support at least 11 rare or endemic insect and plant species, and provide the largest habitat for the federally endangered El Segundo blue butterfly. Contrary to popular belief, however, only a portion of the dunes is protected from development.

The Urban Wildlands Group has years of experience with the ecology and restoration of the dunes. We now jointly operate a nursery specializing in the native plants of this habitat. We have received a federal grant to identify and restore habitat for El Segundo blue butterflies on private property, a State grant (with the Los Angeles Conservation Corps) to restore dune habitat in Redondo Beach and to develop a Master Plan to identify potential restoration sites from Ballona Creek to the Palos Verdes peninsula, and have entered a contract with the County of Los Angeles to restore dune habitat in Torrance. In addition, most of the peer-reviewed academic research on the El Segundo blue butterfly and the El Segundo dunes has been published by our scientists.

The lack of protection of the northern 100 acres of the El Segundo dunes at LAX has been a source of deep concern for the Los Angeles conservation community.

The El Segundo dunes at LAX are bounded by Vista Del Mar Boulevard, Imperial Highway, Pershing Drive, Napoleon Street, and Waterview Street. In 1992, the City of Los Angeles approved a Specific Plan for the El Segundo dunes that designated three land uses for this area:

“dunes habitat preserve” (southern 200 acres), “proposed golf course” (northern 100 acres), and park (2 acres).¹ Also in 1992, a Local Coastal Plan that included a golf course was submitted to the California Coastal Commission for approval, but the submission was deemed incomplete and the plan was withdrawn.² In 1994, the zoning for the parcels in the dunes was set at [Q]OS-1-XL, which disallowed development in the dunes habitat preserve and restricted use of the remainder of the property to “a nature preserve and accessory uses only.”³ Notwithstanding this designation, plans for a golf course in the northern 100 acres of the dunes have resurfaced periodically. For example, the 2001 Draft EIS/EIR for the LAX Master Plan included land use designations for the northern 100 acres that were confusingly coded as either a golf course or a hotel resort.

Development of a golf course or hotel resort on this land would cause unacceptable environmental damage to the El Segundo dunes. Although this portion of the dunes has not been fully restored and does not currently support El Segundo blue butterflies, it nevertheless has significant ecological values, supporting other rare insect and plant species. The California Coastal Commission has determined that the northern 100 acres of the dunes is indeed an Environmentally Sensitive Habitat Area (“ESHA”), which is protected from disruption of habitat values by Section 30240 of the California Coastal Act. In response to the LAX Master Plan Draft EIS/EIR in 2001, the Commission commented on the proposed use of the dunes:

The Commission’s review of any development proposed in the dunes would require protecting the long-term viability of the dune habitat and the endangered species that depend on the dunes before approving any proposal. A hotel or golf course on the dunes would not be a use that is dependent on the resource. Therefore construction of a hotel or golf course on the dunes would raise serious issues of conformity of Section 30240 of the Coastal Act.⁴

The Commission subsequently reaffirmed that the northern 100 acres is ESHA when considering LAX’s application for a retroactive permit for landscaping along Waterview and Napoleon streets, stating that, “the 302 acre dune habitat is still connected and functions as a contiguous habitat.”⁵ Furthermore, the U.S. Fish and Wildlife Service identifies the dunes at LAX to be of international natural resource significance.⁶ Finally, the County of Los Angeles identifies the dunes as described here as a Significant Ecological Area.

We envision the full restoration of the 302 acres of El Segundo dunes at LAX. Habitat values have been enhanced within the 200-acre preserve area, but vigilant management is necessary to control invasive species there. The northern 100 acres could be restored at a reasonable cost, and

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1. City of Los Angeles. Los Angeles Airport/El Segundo Dunes Specific Plan. Ordinance No. 167,940, effective June 28, 1992.
 2. California Coastal Commission. Staff Report: Denovo & Regular Calendar (A-5-PDR-01-442/5-02-008), March 7, 2002.
 3. City of Los Angeles. Ordinance No. 169,767, effective June 12, 1994.
 4. California Coastal Commission (Teresa Henry, District Manager and Derek Lee, Water Quality Specialist). Memo to Los Angeles World Airports re: Draft EIS/EIR, Los Angeles International Airport Proposed Master Plan Improvements, September 24, 2001.
 5. California Coastal Commission. Staff Report: Denovo & Regular Calendar (A-5-PDR-01-442/5-02-008), March 7, 2002.
 6. U.S. Fish and Wildlife Service. 1998. Recovery Plan for the El Segundo blue butterfly (*Euphilotes battoides allyni*). Portland, Oregon.

would offer an excellent opportunity for passive recreation and education as articulated in the 1994 zoning. If security concerns could be addressed, a boardwalk could be developed in this area (similar to that at Asilomar), which would become a destination for residents, tourists, and school groups.

Protection and restoration of the entire El Segundo dunes at LAX is essential to the long-term viability of the rare species living there. The dunes could anchor the northern end of a series of restored dune fragments in the cities of El Segundo, Manhattan Beach, Hermosa Beach, Redondo Beach and Torrance, all connected by the coastal bike path. We are currently preparing a Master Plan to investigate the feasibility of restoring a backbone of habitats along the former extent of the El Segundo dunes. The fully restored dunes at LAX, complemented by a public boardwalk, would provide the ideal northern terminus for an enhanced El Segundo dunes coastal trail.

This vision offers an opportunity to enhance and restore a beautiful coastal dune environment, to provide for public education and passive recreation, and to recognize the intrinsic biological significance of this dune system. Our proposal avoids the many adverse consequences to natural resources of a golf course or hotel resort and would be consistent with state and federal law. A partnership of public and nonprofit organizations could design, seek funding for, and manage such a project. The Urban Wildlands Group is prepared to lead such a coalition.

Thank you for considering this proposal; we look forward to learning your perspective on this issue.

Sincerely,

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

cc: Senator Barbara Boxer
Senator Dianne Feinstein
Congresswoman Jane Harman
Congresswoman Maxine Waters
State Senator Debra Bowen
State Assemblyman George Nakano
Supervisor Don Knabe
Supervisor Yvonne Brathwaite Burke
Supervisor Zev Yaroslavsky
Mayor James K. Hahn, City of Los Angeles
Jim Bartel, U.S. Fish and Wildlife Service
Charles Raysbrook, California Department of Fish and Game
Al Wright, Wildlife Conservation Board
Peter Douglas, California Coastal Commission
Sam Schuchat, California Coastal Conservancy
Marianne Yamaguchi, Santa Monica Bay Restoration Commission