3.3 BIOLOGICAL RESOURCES

This section of the Environmental Impact Report (EIR) describes the existing biological resources at the Beach Cities Health District (BCHD) campus and the surrounding vicinity and analyzes potential impacts that could result from the implementation of the proposed BCHD Healthy Living Campus Master Plan (Project). This analysis is based on the technical assessments provided by a Biological Evaluation prepared by Hamilton Biological, Inc. (2019a), a Nesting Bird Survey Report prepared by Hamilton Biological, Inc. (2019b), and a Tree Inventory Report prepared by Carlberg Associates (2019) (see Appendix C). Each of these technical studies has been peer reviewed by Wood Environment & Infrastructure, Inc. (Wood) senior biologists, with decades of experience conducting vegetation surveys and nesting bird surveys throughout Southern California.

The BCHD campus is located approximately 1 mile inland and outside of the Coastal Zone boundary, occupying a densely-developed area surrounded by residential and commercial land uses (refer to Section 2.2.1, *Project Location*). Due to the developed, urbanized character of the Project site and the surrounding vicinity and the lack of native habitat, there are no biological resources on-site that are considered significant under the California Environmental Quality Act (CEQA), except for non-native landscaped trees that have the potential to provide nesting and roosting habitat for migratory birds. Therefore, the analysis of effects to biological resources provided in this EIR is generally limited to potential impacts related to the removal or alteration of nesting or roosting trees.

3.3.1 Environmental Setting

Regional Setting

Redondo Beach and Torrance are located within Los Angeles County, situated approximately 7 miles south of the Los Angeles International Airport (LAX) at the southern edge of the Santa Monica Bay and approximately 20 miles south of the Santa Monica Mountains. Redondo Beach and Torrance are developed cities characterized almost entirely with buildings, parking lots, paved roads, sidewalks, and other urban development. There is very little native terrestrial vegetation in the area. Most large groupings of mature trees, shrubbery, and other low-growing vegetation is found in parks and other small, isolated open spaces. Most of the vegetation in Redondo Beach

and Torrance consists of commercial and residential landscaping. This vegetation provides limited habitat for urban-dwelling rodents and feral and domesticated mammals. However, street trees and other landscaped trees throughout the cities provide potential nesting and roosting sites for resident and migratory birds.

The Project site is located adjacent to Dominguez Park. Landscaped trees at this location could provide habitat or roosting for residential and migratory species.

Several small (i.e., less than 6 acres) wetlands – identified in the National Wetlands Inventory (NWI) – are located in Redondo Beach and Torrance; however, none of these wetlands are located in the immediate proximity of the Project site (U.S. Fish and Wildlife Services [USFWS] 2020a). As such, the operation of the BCHD campus has no direct or indirect effects on their ecological function. These wetland features are not visible from the campus, do not receive runoff from the campus, and are not affected by nighttime lighting from the campus.

Los Angeles County Significant Ecological Areas

Redondo Beach and Torrance are located in close proximity to the Pacific Ocean as well as four Significant Ecological Areas (SEAs), which is a designation given by Los Angeles County to lands that contains irreplaceable biological resources. These SEAs – including the Madrona Marsh Preserve, El Segundo Dunes, Ballona Wetlands, and Santa Monica Mountains –serve as larger blocks of native habitat that support special status species and, in some cases, riparian habitat or other sensitive natural communities. However, none of these SEAs are located in the close proximity to the Project site. The Madrona Marsh is located approximately 2.5 miles from the BCHD campus, while the Santa Monica Mountains SEA is located more than 20 miles from the campus. As such, the operation of the BCHD campus has no direct or indirect effects on their ecological function. The SEAs are not visible from the campus, do not receive runoff from the campus, and are not affected by nighttime lighting from the campus.

Wildlife Corridors

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for dispersal or migration. Wildlife corridors contribute to population viability by ensuring continual exchange of genes between populations, providing access to adjacent habitat areas for foraging and mating, and providing routes for recolonization of habitat after local extirpation or

ecological catastrophes such as fires. Habitat linkages are smaller patches of habitat that join larger blocks of habitat and generally reduce the adverse effects of habitat fragmentation associated with surrounding development. Habitat linkages may be represented by continuous patches of habitat or by nearby habitat "islands" that function as steppingstones for dispersal and movement – particularly for birds and flying insects. Given the extent of surrounding development, and the distances between larger blocks of habitat (including SEAs), there are no designated regional habitat linkages between the SEAs. Additionally, there are no terrestrial wildlife corridors traversing the City of Redondo Beach or the City of Torrance.

The Pacific Flyway is a major north-south route of travel for migratory birds in America, extending along the Western American coast from Alaska south to the Patagonia region in South America (USFWS 2020b). Migratory birds travel some or all of this distance annually to follow food sources, head to breeding grounds, or travel to suitable overwintering sites. Along the Pacific Flyway, there are many key "rest stops" or temporary habitat areas where some bird species gather to feed and recuperate. For example, the Ballona Wetlands are one of many rest stops along the Pacific Flyway. Some species may remain in these rest stops for the entire season, but most stay a few days before moving on. Redondo Beach and Torrance are located along the Pacific Flyway and may host migratory birds using street trees or other landscaped trees or shrubs as rest stops. The Monarch butterfly (*Danaus plexippus*)[1] also migrates along the Pacific Flyway and roosts in locations along the Pacific coastline, typically where eucalyptus trees (*Eucalyptus* spp.) and occasionally pine trees (*Pinus* spp.) are located. However, there are no known roosting sites for migratory species or Monarch butterflies within Redondo Beach or Torrance.

Project Setting

The description of biological resources at the Project site is based on a Biological Evaluation prepared by Hamilton Biological, Inc. (2019a), a Nesting Bird Survey Report prepared by Hamilton Biological, Inc. (2019b), and a Tree Inventory Report prepared by Carlberg Associates (2019) (see Appendix C).

The Project site is bordered by residential land uses to the west, south, east and the Redondo Village Shopping Center to the north (refer to Section 2.2.2, *Surrounding Land Uses*; refer to Figure 2-2). Additionally, the Project site is surrounded by heavily trafficked, arterial roadways including North Prospect Avenue to the southwest and Beryl Street to the north. Diamond Street to the southeast and Flagler Lane to the east support lighter, residential traffic. All surrounding

[1] The listing status of the monarch butterfly under the Endangered Species Act (ESA) is currently under review. In 2014, the USFWS was petitioned to protect the monarch butterfly under the Endangered Species Act. A species status assessment report is currently being prepared. The final listing decision of the monarch is expected in December 2020 (USFWS 2020c).

roadways are lined with concrete sidewalks, aboveground utilities, streetlights, and occasional street signs with very little urban landscaping.

The Project site is generally characterized by paved surfaces; however, the steep slope along Flagler Alley as well as the vacant Flagler Lot include landscaped trees and shrubs. which may provide habitat for nesting birds.

The BCHD campus is approximately 90 percent paved and developed with multi-story buildings and paved parking lots. The majority of landscaped vegetation occurs along the perimeter of the Project site, with larger stands of landscaped trees occurring along the Project site frontage with Diamond Street, Flagler Lane, and Flagler Alley. The vacant Flagler Lot at the intersection of Flagler Lane & Beryl Street is undeveloped and characterized by patches of low-growing weedy vegetation.

Vegetation

Vegetation occurring on and immediately adjacent to the Project site (e.g., within the Redondo Village Shopping Center) consists primarily of non-native species commonly used in commercial landscaping, such as silver dollar eucalyptus (*Eucalyptus polyanthemos*), Mexican fan palm (*Washingtonia robusta*), wild radish (*Raphanus sativus*), Bermuda grass (*Cynodon dactylon*), and crab grass (*Digitaria sanguinalis*). A list of landscaped plant species observed during the field survey conducted by Hamilton Biological, Inc. (2019a) is provided in Table 3.3-1. No native habitats were identified within the Project site (Hamilton Biological, Inc. 2019a).

Table 3.3-1. Plant Species Observed on the Project Site

Common Name	Species Name
Herbaceous Weeds	
Wild raddish	*Raphanus sativus*
Garland chrysanthemum	*Glebionis coronaria*
Cheeseweed	*Malva parviflora*
Puncturevine	*Tryonia imitator*
London rocket	*Sisymbrium irio*
Dandelion	*Taraxacum officinale*
Exotic Grasses	
Smilo grass	*Piptatherum miliaceum*
Bermuda grass	*Cynodon dactylon*
Crab grass	*Digitaria sanguinalis*
Trees	
Blackwood acacia	*Acacia melanoxylon*
Golden wreath wattle	*Acacia saligna*
African fern pine	*Afrocarpus falcatus*
Lemons bottle brush	*Callistemon citrinus*
Floss silk tree	*Ceiba speciose*
Bronze loquat	*Eriobotrya deflexa*
Japanese loquat	*Eriobotrya japonica*
Spider gun	*Eucalyptus conferruminate*
Flooded gum	*Eucalyptus rudis*
Weeping palm	*Ficus benjamina*
Indian laurel fig	*Ficus microcarpa*
Australian willow	*Geijera parviflora)*
Jacaranda	*Jacaranda mimosifolia*
Hollywood juniper	*Juniperus chinensis 'Torulosa'*
Brisbane box	*Lophostemon confertus*
Paperbark	*Melaleuca quinquenervi*
Olive tree	*Olea europaea*
Canary Island date palm	*Phoenix canariensis*
Fraser photinia	*Photinia x fraseri*
Canary Island pine	*Pinus canariensis*
Aleppo pine	*Pinus halepensis*
Brazillian pepper	*Schinus terebinthifolius*
Queen palm	*Syagrus romanzoffiana*
Mexican fan palm	*Washingtonia robusta*

Notes: This list of plant species on the Project site includes the existing BCHD campus as well as the vacant Flagler Lot.
Source: Hamilton Biological, Inc. 2019a.

A separate Tree Inventory Report was prepared for the Project site to inventory all of the individual trees within and immediately adjacent to the Project site (Carlberg Associates 2019). The Tree Inventory Report identified 228 trees ranging from 5 to 51 feet in height and 1 to 29 inches in diameter (measured at a height of approximately 4.5 feet). Larger mature landscaped trees occur along the Diamond Street as well as Flagler Lane and Flagler Alley, which form the eastern boundary of the Project site. Other slightly smaller landscaped trees are commonly found adjacent to existing buildings (e.g., Beach Cities Advanced Imaging Building).

The Project site is entirely developed and almost completely covered with paved surfaces; however, landscaping including trees and shrubs occur along the perimeter of the Project site and in planters near the existing buildings. The larger mature trees occur along the eastern boundary of the Project site adjacent to Diamond Street as well as Flagler Lane and Flagler Alley. Smaller trees, shrubs, and turf grass are located adjacent to the building footprint.

Carlberg Associates (2019) graded the physiological condition (i.e., health) of the trees on a scale of A through F. The physiological condition of a majority of trees on Project site received a rating of A (Outstanding with good growth form and vigor) or B (Above Average with minor symptoms of stress or disease) (Carlberg Associates 2019). A similar grading scale was used to rate trees' structural condition. Over 97 percent of trees located on the Project site received a rating of C (Average, or moderate structure with defects, decay, or disease).

Wildlife

Wildlife species were observed during the field survey associated with the Biological Evaluation (2019a) and Nesting Bird Survey Report (2019b). These species – including several birds, sandy beach tiger beetle, and western fence lizard – are identified in Table 3.3-2.

Table 3.3-2. Wildlife Species Observed on the Project Site

Common Name	Species Name
Birds	
Cedar waxwing	*Bombycilla cedrorum*
Anna's hummingbird	*Calypte anna*
Swainson's thrush	*Catharus ustulatus*
Rock pigeon*	*Columba livia*
American crow	*Corvus brachyrhynchos*
Yellow warbler	*Dendroica petechia*
Pacific-slope flycatcher	*Empidonax difficilis*
Hooded oriole	*Icterus cucullatus*
California towhee	*Melozone crissalis*
House sparrow*	*Passer domesticus*
Lazuli bunting	*Passerina amoena*
Blue grosbeak	*Passerina caerulea*
Black-headed grosbeak	*Pheucticus melanocephalus*
Western tanager	*Piranga ludoviciana*
Bushtit (Pacific)	*Psaltriparus minimus*
House finch	*Rallus longirostris levipes*
Black phoebe	*Sayornis nigricans*
Allen's hummingbird	*Selasphorus sasin*
Hermit warbler	*Setophaga occidentalis*
Lesser goldfinch	*Spinus psaltria*
Eurasian collared-dove*	*Streptopelia decaocto*
European starling*	*Sturnus vulgaris*
Orange-crowned warbler	*Vermivora celata*
Warbling vireo	*Vireo gilvus*
Wilson's warbler	*Wilsonia pusilla*
Mourning dove	*Zenaida macroura*
Invertebrates	
Sandy beach tiger beetle	*Cicindela hirticollis gravida*
Reptiles	
Western fence lizard	*Sceloperus occidentalis*

Notes: *Non-native species
Source: Hamilton Biological, Inc. 2019b.

Many of the birds observed are migratory species that generally do not nest in Redondo Beach or Torrance. However, one active Allen's hummingbird nest was detected during the field survey associated with the Nesting Bird Survey Report (Hamilton Biological, Inc. 2019b).

No mammals were detected during the field survey, but expected species include the non-native eastern fox squirrel (*Sciurus niger*) and several native species, including the botta pocket gopher (*Thomomys bottae*), raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), and Striped skunk (*Mephitis mephitis*) (Hamilton Biological, Inc. 2019a). Due to the presence of the Silverado Memory Care Community and associated dining services on the BCHD campus, BCHD has a pest control program and dedicated contractor that routinely sets traps and/or exterminates nuisance pests on the campus.

Special-Status Species

The California Natural Diversity Database (CNDDB) is an inventory of the status and locations of rare plants and wildlife in California, maintained by the California Department of Fish and Wildlife (CDFW). The CNDDB organizes regional data by 7.5-minute quadrangle maps. Federal and state listed species known to occur in the Redondo Beach quadrangle map, where the Project site is located, includes recorded observations of the federally endangered Pacific pocket mouse (*Perognathus longimembris pacificus)*, federally endangered Palos Verdes blue butterfly (*Glaucopsyce Iygdamus palosverdesenis*), federally endangered El Segundo blue butterfly (*Eupilotes battoides allyni)*, State endangered willow flycatcher (*Empidonax traillii*), State threatened beach spectaclepod (*Dithyrea maritima)*, and State candidate endangered Croth bumle bee (*Bombus crotchii)* (CDFW 2021). However, given the developed, urbanized character and the lack of undisturbed native habitats within Project site and surrounding vicinity, the potential for special-status wildlife species to occur at the Project is very low (Hamilton Biological, Inc. 2019a).

Based on the review of the CNDDB and the habitat assessment conducted by Hamilton Biological, Inc. (2019a) three special status species would have the potential to occur on the Project: Cooper's Hawk (*Accipiter cooperii*), southern tarplant (*Centromadia parryi*) and the monarch butterfly (*Danaus plexippus*) (see Table 3.3-3).

Southern Tarplant. Southern tarplant is designated as California Rare Plant Rank (CRPR) by the California Native Plant Society (CNPS) and typically occurs on flat, disturbed ground near the coast that receives intermittent flooding. The vacant Flagler Lot in the northeastern corner of the Project site has marginal potential to support southern tarplant. However, the species very rarely occurs in disturbed areas and no signs of the plant were observed during the field survey. Therefore, this species is considered to have a very low potential to occur on the Project site (Hamilton Biological, Inc. 2019a).

Table 3.3-3. Special-Status Species with Potential to Occur On-site

Common Name	Species Name	Habitat	Occurrence or Potential for Occurrence	Status
Plants				
Southern tarplant	*Raphanus sativus*	Flat, disturbed ground near the coast that receives intermittent flooding.	**Very Low** Suitable habitat present; known historically in region	CRPR 1B.1
Invertebrates				
Monarch butterfly	*Piptatherum miliaceum*	Overwinter in groves of eucalyptus or pines, in natural areas between a half-mile and one mile from the coast.	**Low** Suitable pine habitat present; known historically in region	-*
Birds				
Cooper's Hawk	*Accipiter cooperii*	Found in a variety of vegetated habitats including urban, suburban, and rural. Requires large trees for nesting.	**High** Moderate potential to breed in vicinity; high potential to occur during migration and/or winter	WL

Notes:
California Rare Plant Rank (CRPR)
1B – Plants rare, threatened or endangered in California and elsewhere
0.1 – Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
State Rank
S2: Imperiled – At high risk of extirpation in the state due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.
S3: Vulnerable – At moderate risk of extirpation in the state due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors.
S4: Apparently Secure – At a fairly low risk of extirpation in the state due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors.
State Status
WL – Watch List
Federal Status
*On December 15, 2020, the USFWS announced that listing the monarch as endangered or threatened under the ESA is warranted but precluded by higher priority listing actions (USFWS 2021). The ESA provides for a warranted-but-precluded finding when the Service does not have enough resources to complete the listing process because the agency must first focus on higher-priority listing rules (USFWS 2020c). With this decision, the monarch becomes a candidate for listing under the ESA, and its status will be reviewed each year until it is no longer a candidate.
Source: Hamilton Biological, Inc. 2019a.

Monarch Butterfly. The Monarch butterfly is considered a California Special Animal. *"Special Animal"* is a broad term used to refer to all the animal taxa tracked by the CDFW in the CNDDB, regardless of their legal or protection status. Monarch butterflies passes through Southern California to overwinter in substantial groves of eucalyptus, and occasionally pines, in natural areas between 0.5 miles and 1 mile from the coast. While the Project site contains mature pine trees, they are relatively small in size and sparsely located throughout the Project site. Therefore, existing pines on-site do not provide suitable overwintering habitat for monarchs. Therefore, monarch butterflies are unlikely to occur on the Project site (Hamilton Biological, Inc. 2019a).

Cooper's Hawk. Cooper's hawk, which is listed on the CDFW Watch List, is a common and widespread raptor species found frequently in urban and suburban areas across Southern California. Cooper's hawk has a moderate potential to breed in the vicinity of the Project site due to rapid expansion of the breeding population into urban and suburban areas. Cooper's hawk has a high potential to be present on the Project site during winter or migration periods. The large mature trees located along the perimeter of the Project site would provide potential roosting areas during seasonal migration. Cooper's hawks that nest in urban areas use tall mature trees found in parks, commercial, and industrial areas (Lepczyk and Warren 2019). Cooper's hawks that use urban areas for habitat also subsist off small and medium sized birds abundant in urban areas (Lepczyk and Warren 2019). Therefore, the Cooper's hawk has potential to nest and forage at the Project site or immediate vicinity (Hamilton Biological, Inc. 2019a).

In summary, the Project site is nearly fully developed and does not provide intact native habitats. No riparian habitat, aquatic features, or other sensitive natural communities, or jurisdictional wetlands are located on or in the vicinity of the Project site. While located along the Pacific Flyway, it is not part of any recognized wildlife corridors or habitat linkages. No federally listed, state-listed, or candidate species have the potential to occur on the Project site. Cooper's hawk, listed on the CDFW Watch List, is the only special status species with a high-potential to occur on the Project site.

3.3.2 Regulatory Setting

Significant biological resources – including plants, wildlife, and their habitats – are subject to multiple Federal, State, and local laws, regulations, and policies that are designed to protect sensitive, threatened, or otherwise special-status species from displacement and loss.

Federal Policies and Regulations

Clean Water Act (CWA)

The Clean Water Act (CWA) authorizes Federal, State, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. Key provisions of the CWA address water quality standards and the establishment of the National Pollutant Discharge Elimination System (NPDES) program for controlling the discharge of stormwater.

Endangered Species Act

The purpose of the Federal Endangered Species Act (ESA) is to protect and recover imperiled species and the ecosystems upon which they depend. The Federal ESA is administered by the USFWS and the National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales, and anadromous fish (e.g., salmonids).

Under the Federal ESA, species may be listed as either endangered or threatened. *"Endangered"* means a species is in danger of extinction throughout all or a significant portion of its range. *"Threatened"* means a species is likely to become endangered within the foreseeable future.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S. Code [USC] §§703-711) includes provisions for the protection of migratory birds, including the non-permitted take of migratory birds, under the authority of the USFWS and CDFW. The MBTA makes it unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, or kill migratory birds, and prohibits the removal of nests occupied by migratory birds. Over 800 species, including geese, ducks, shorebirds, raptors, songbirds, and many common species are protected under the MBTA.

State Policies and Regulations

California Endangered Species Act

The California Endangered Species Act (CESA) declares that all native plant or wildlife species threatened with extinction and those experiencing a significant decline will be given protection by the State because they are of ecological, educational, historical, recreational, aesthetic, economic, and scientific value to the people. CESA establishes that it is State policy to conserve, protect, restore, and enhance endangered species and their habitats. Under State law, plant and wildlife species may be formally designated as rare, threatened, or endangered. Listed species are given greater attention during the land use planning process by local governments, public agencies, and landowners than are species that have not been listed.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) and implementing regulations in of the California Fish and Game Code Section 1900 *et seq.* designates rare and endangered plants and provides specific

protection measures for identified populations. The NPPA was enacted to, *"preserve, protect, and enhance endangered or rare native plants of this state."* The NPPA defines a plant as endangered when its prospects of survival and reproduction are in immediate jeopardy from one or more causes. A rare plant is defined as a plant species that, though not presently threatened with extinction, occurs in such small numbers throughout its range that it may become endangered if its present environment worsens. The NPPA prohibits the take or sale of rare and endangered plants in California. However, the law includes broad exemptions to the prohibition of take, including removal of endangered or rare plants from a building site, road, or right-of-way.

California Fish and Game Code (Sections 3503, 3503.5, and 3800)

California Fish and Game Code Sections 3503, 3503.5, and 3800 prohibit the take or possession of birds, their nests, or eggs. Disturbance that causes nest abandonment and/or loss of reproductive effort (e.g., killing or abandonment of eggs or young) is considered a take. Such a take would also violate Federal law protecting migratory birds. Incidental Take Permits are required from the CDFW for projects that may result in the incidental take of species listed as endangered, threatened, or candidate species. The permits require that impacts to protected species be minimized to the extent possible and mitigated to a level of insignificance.

City of Redondo Beach Local Policies and Regulations

Redondo Beach General Plan Land Use Element

The Redondo Beach General Plan Land Use Element establishes goals, objectives, policies, and implementation programs to guide the manner in which new development will occur and existing uses will be conserved. The following policies aim to create and maintain high quality visual landscapes throughout the City.

Objective 1.55: Provide for the landscaping of residential, commercial, industrial and public sites to be compatible with existing development exhibiting significant and recognized landscape and site design assets and establish an improved visual image and landscape quality where not currently existing in the City.

Policy 1.55.1 Review existing and modify, as necessary, landscaping standards and guidelines for development which promote a high level of visual and environmental quality and require developers to incorporate adequate landscape on-site (I1.18).

Policy 1.55.2 Select landscape and tree species which complement the architectural design of structures and reflect the intended functional, physical, and visual character of the district in which they are located (I1.18).

Policy 1.55.3 Require that development projects submit and implement a landscaping plan (I1.1, I1.7).

Policy 1.55.5 Encourage developers to incorporate mature and specimen trees and other significant vegetation which may exist on a site into the design of a development project for that site (I1.18).

Policy 1.55.6 Require that surface parking lots incorporate trees which will provide extensive shade cover within two years of completion of construction (e.g., canopy coverage versus vertical palms) (I1.1, I1.7, I1.18).

Policy 1.55.7 Encourage the use of drought-tolerant species in landscape design (I1.1, I1.18).

Redondo Beach Municipal Code

Redondo Beach Municipal Code (RBMC) Section 10-5.1900 aims to establish standards for installation of landscaping in order to enhance the aesthetic appearance of properties within the City, ensure the quality, quantity, and appropriateness of landscape materials, effect a functional and attractive design, improve compatibility between land uses, conserve water, control soil erosion, and preserve the character of existing neighborhoods. Landscaping plans of projects within the City shall comply with the following criteria:

- **Plant type**. Drought-tolerant plants shall be used where feasible. Recommended drought-tolerant plant species are listed in the City of Redondo Beach List of Recommended Trees and Water Conserving Plants maintained by the Superintendent of Parks.
- **Plant size**. Plants shall be sized and spaced to achieve immediate effect and shall normally not be less than a 15-gallon container for trees, 5-gallon container for shrubs, and a one-gallon container for mass planting. Groundcover coverage must be 100 percent in one year, with rooted cuttings from flats planted no more than 12 inches on center, and containerized woody, shrub ground cover planted no more than 3 feet on center.
- **Landscape plans**. Landscape plans shall incorporate existing mature trees with trunk diameters of 6 inches or greater that are compatible with the proposed grades, structures,

for all new residential projects of two or more units. A landscape plan and irrigation plan may be required in conjunction with other projects requiring Administrative Design Review, Planning Commission Review, Conditional Use Permit, or Variance.

City of Torrance Local Policies and Regulations

Torrance General Plan Community Resources Element

The Torrance General Plan Community Resources Element establishes goals, objectives, policies, and implementation programs to enhance of community qualities that distinguish Torrance. The following policies focus on the preservation and management of open space, providing parks, recreation, and community facilities for all residents, historic preservation, natural resource conservation, preservation of scenic resources, managing energy resources, reducing greenhouse gas emissions, and promoting sustainable building practices.

Objective CR.18: Preserve significant strands of trees and to establish a comprehensive plan to protect and enhance the urban forest.

Policy CR.18.1 Preserve specimen trees whether they occur on public or private property and promote the planting of new trees.

Policy CR.18.2 Provide, maintain, and encourage appropriate street trees along all sidewalks and property frontages.

Torrance Municipal Code

Tree protection and maintenance measures are provided in the Torrance Municipal Code (TMC) Sections 75.1.1 through 75.2.7, which constitutes the Torrance Tree Ordinance:

Section 75.1.5(a): No person may cut, trim, remove, prune, plant, injure or interfere with any tree upon any street, park, alley or public place of the City without first obtaining a permit from the Public Works Director. The permit will be valid for 30 days.

Section 75.1.11. During the erection, repair, alteration or removal of any building, house or structure in the City, no person in charge of such work shall leave any tree, shrub or plant in any street, park, boulevard, alley or public place of the City in the vicinity of such building or structure without good and sufficient guards or protectors as shall prevent injury to such tree, shrub or plant arising out of or by reason of the erection, repair, alteration or removal.

Section 75.1.5(a): No person may cut, trim, remove, prune, plant, injure or interfere with any tree upon any street, park, alley or public place of the City without first obtaining a permit from the Public Works Director. The permit will be valid for 30 days.

Section 75.1.11. During the erection, repair, alteration or removal of any building, house or structure in the City, no person in charge of such work shall leave any tree, shrub or plant in any street, park, boulevard, alley or public place of the City in the vicinity of such building or structure without good and sufficient guards or protectors as shall prevent injury to such tree, shrub or plant arising out of or by reason of the erection, repair, alteration or removal.

Torrance Street Tree Planting Plan

The Torrance Street Tree Master Plan, adopted in April 2015, was created to enhance and preserve the city's trees by having a set list of recommended trees that would best fit each area of the City. The Torrance Street Tree Planting Matrix (2015) provides the following tree species recommendations for Beryl Street and Flagler Lane:

Beryl Street:

- Indian Laurel Fig (*Ficus microcarpa*)
- Saint Mary Magnolia (*Magnolia grandiflora*)
- Bronze Loquat (*Eriobotrya deflexa*)
- Toyon (*Heteromeles arbutifolia*)

Flagler Lane:

- Strawberry Tree (*Arbutus unedo*)
- Hong Kong Orchid Tree (*Bauhinia blakeana*)
- Chinese Fringe Tree (*Chionanthus retusus*)

3.3.3 Impact Assessment Methodology

Thresholds for Determining Significance

The following thresholds of significance are based on Appendix G of the 2020 CEQA Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on biological resources if:

a) The project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS.

b) The project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.

c) The project would have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) The project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

e) The project would conflict with any Federal, State, local policies or ordinances protecting biological resources, such as tree preservation policy/ordinance.

f) The project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Screened-Out Threshold(s):

- Threshold (a) (*Sensitive Species*): The existing BCHD campus is fully developed with multi-story buildings and paved surfaces. Vegetation on the Project site is limited to landscaped trees, shrubs, and grasses. Additionally, the Project site is surrounding by residential and commercial development as well as arterial roadways. As described in the Biological Evaluation prepared by Hamilton Biological, Inc. (2019a) no federally listed or State-listed species are known to occur on the Project site or the immediate surrounding vicinity. Species expected to occur on-site would be limited to animals that are commonly found in urban environments. Therefore, for the reasons stated above and as discussed in Section IV, *Biological Resources* of the Initial Study (IS), this issue is not further analyzed in the EIR. Potential impacts to migratory birds associated with the removal of landscaped vegetation is discussed further under Impact MM BIO-1.
- Threshold (b) (*Sensitive Natural Communities*): Existing vegetation on-site is limited to landscaped trees, shrubs, and grasses. No sensitive natural community including wetlands, streams, creeks, lakes, vernal pools, marshes, other water bodies, or riparian habitats exists on the Project site or in the surrounding vicinity. Therefore, for the reasons stated above

and as discussed in Section IV, *Biological Resources* of the IS, there would be no adverse effects to sensitive natural communities and this issue is not further analyzed in the EIR.

- Threshold (c) (*Wetlands*): The Project site does not contain and is not located in close proximity to any wetland areas. There would be no filling, dredging, or other modification to wetland areas, and no impacts would occur. Therefore, for the reasons stated above and as discussed in Section IV, *Biological Resources* of the IS, this issue is not further analyzed in the EIR.
- Threshold (d) (*Wildlife Corridors*): Due to the developed, urbanized nature of the Project site and the surrounding vicinity, there are no recognized wildlife corridors or habitat linkages. Re-development of the existing BCHD campus would not result in short- or long-term impacts to the movement of fish or wildlife species. Similarly, the re-development of the existing BCHD campus would not result in impacts to nursery sites. Therefore, for the reasons stated above and as discussed in Section IV, *Biological Resources* of the IS, this issue is not further analyzed in the EIR. Potential impacts to migratory birds associated with the removal of landscaped vegetation is discussed further under Impact BIO-1.
- Threshold (f) (*Habitat Conservation Plan*): The Project site is devoid of significant habitat identified in any Federal, State, and local conservation plans. Additionally, the Project site is not located within a planning area for any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other conservation plans. As such, for the reasons stated above and as discussed in Section IV, *Biological Resources* of the IS, the proposed Project would not conflict with any adopted conservation plans, and this issue is not further analyzed in the EIR.

Methodology

As previously described, this analysis is based on a Biological Evaluation prepared by Hamilton Biological, Inc. (2019a), a Nesting Bird Survey Report prepared by Hamilton Biological, Inc. (2019b), and a Tree Inventory Report prepared by Carlberg Associates (2019). The Biological Evaluation consisted of literature review – including a review of the CNDDB and the CNPS Inventory of Rare and Endangered Plants – as well as a field survey conducted on May 9, 2019. (Another separate field survey was conducted on July 9, 2019 associated with the Tree Inventory Report.)

Due to the developed, urbanized character of the Project site and the surrounding vicinity, the analysis of biological resources is focused on potential impacts to the landscaped trees and shrubs at the Project site that could potentially serve as nesting and roosting sites for resident or migratory birds.

3.3.4 Project Impacts and Mitigation Measures

Impact Description (BIO-1)

a) The project would conflict with any Federal, State, local policies or ordinances protecting biological resources, such as tree preservation policy/ordinance.

BIO-1 The proposed redevelopment of the Beach Cities Health District (BCHD) campus – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would result in the removal of landscaped trees, shrubs, and other non-native vegetation that may provide nesting and roosting habitat. With the implementation of pre-construction nesting bird surveys, if necessary, and new landscaping, the proposed Project would not substantially interfere with resident or migratory birds. Impacts would be *less than significant with mitigation*.

The proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program – would redevelop the existing BCHD campus, which is located in a developed, urbanized area and is surrounded on all sides by residential and commercial development as well as heavily trafficked, arterial roadways. However, as described in Section 3.3.1, *Existing Setting*, landscaped trees, shrubs, and other non-native vegetation on the existing BCHD campus could provide suitable nesting and roosting opportunities for resident and migratory bird species afforded protection under the MBTA and/or California Fish and Game Code. For example, the nesting bird survey conducted in May 2019 found one active Allen's hummingbird nest (Hamilton Biological, Inc. 2019b).

The Tree Inventory Report prepared by Carlberg Associates (2019) concluded that 219 of the 228 of the landscaped trees located on the Project site are in good condition. These trees would be preserved in place where feasible. However, redevelopment of the Project site would require the direct removal of approximately half of the existing landscaped trees as well as a number of shrubs and other non-native ground cover. Additionally, adjacent vegetation, not proposed for removal, could be indirectly impacted by intrusion into their root zone.

Construction under the Phase 1 preliminary site development plan would require the removal of approximately 20 landscaped trees along Flagler Lane (north of Towers Street) and approximately 60 trees along the northern perimeter of the campus to provide space for the proposed footprint of the Residential Care for the Elderly (RCFE) Building. (The removal of trees within the City of Torrance right-of-way would require issuance of a permit from the Public Works Direct pursuant to TMC 75.1.5[a].) Additionally, construction under Phase 1 would require removal of an

additional 20 landscaped trees along Diamond Street to provide space for the SCE Substation Yard. Similarly, while a site development plan has not yet been selected for Phase 2, the development program would also require the removal of additional landscaped trees and shrubs within the interior portions of the existing BCHD campus.

In addition to direct removal and indirect impacts to landscaped trees and shrubs, the proposed construction activities would result in a temporary increase in exterior noise that could also have an indirect impact on wildlife potentially occupying the Project site and the surrounding vicinity. However, the implementation of Mitigation Measure (MM) BIO-1 would avoid direct and indirect impacts to resident and migratory birds. MM BIO-1 would require that construction activities would not be conducted within 500 feet of suitable vegetation or structures that provide nesting habitat for resident and migratory birds during the nesting bird season (i.e., between February 15 and August 31) to the maximum extent practicable. If construction within the nesting season cannot be avoided, a nesting bird survey would be conducted by a qualified biologist. If active nests are discovered during the pre-construction nesting bird survey, the locations of these nests would be flagged and avoided until the qualified biologist has determined that young have fledged (i.e., left the nest), or the nest becomes inactive. With implementation of MM BIO-1, the proposed Project would not adversely impact any resident or migratory birds and this impact would be *less than significant with mitigation*.

The proposed landscaping plan would replace this vegetation with new vegetation that meets the landscaping regulations provided in RBMC Section 10-5.1900. Additionally, the proposed tree removal and the proposed landscaping plan along Flagler Lane within the City of Torrance right-of-way would be consistent the Torrance Street Tree Master Plan and would incorporate the tree species recommendations for Flagler Lane (refer to Section 3.3.2, *Regulatory Setting*). The proposed landscaping – including large landscaped trees – would provide enhanced roosting or nesting habitat for resident and migratory birds. Therefore, long-term impacts to resident and migratory birds protected under the MBTA and/or California Fish and Game Code would be *less than significant*.

Mitigation Measure (MM)

MM BIO-1 ***Pre-Construction Nesting Bird Surveys.*** *To prevent impacts to nesting or roosting birds through loss or damage of mature trees, Beach Cities Health District (BCHD) shall comply with the following:*

- *Where suitable vegetation and structures for nesting birds occur within 500 feet of project construction activities, all phases of construction*

shall avoid the general nesting season (i.e., between February 15 and August 31) to the maximum extent practicable.

- *If the nesting season cannot be avoided, a qualified biologist shall be retained to conduct a pre-construction survey for nesting birds. The survey shall be conducted within 72 hours prior to commencement of vegetation removal.*
- *If any nesting birds are present within or immediately adjacent to the construction area, the following shall be required: A qualified biologist shall be retained by BCHD to flag and demarcate the location of all nesting birds and monitor construction activities. Temporary avoidance of active nests, including the enforcement of an avoidance buffer determined by the qualified biological monitor, shall be required until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.*
- *If Federal or State protected species are observed during the site survey, consultation shall be completed with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) to determine if work shall commence or proceed during the breeding season; and, if work may proceed, what specific measures shall be taken to ensure protected bird species are not affected.*

Residual Impacts

With implementation of the recommended MM BIO-1 and compliance with Federal, State, and local regulations, impacts on biological resources – including resident and migratory birds provided with protection under the MBTA and/or California Fish and Game Code – would be reduced to *less than significant.*

Cumulative Impacts

A cumulative impact to biological resources would occur if the impacts associated with the proposed Project, when combined with other pending, approved, and recently completed projects within Redondo Beach, Torrance, and the other neighboring South Bay communities would result in significant loss of or damage to biological resources. However, the existing BCHD campus generally lacks intact native habitats. While construction during Phase 1 and Phase 2 of the proposed Project would remove landscaped vegetation, this landscaped vegetation would be replaced under the proposed landscaping plan. Additionally, the implementation of MM BIO-1 would avoid potential impacts to resident and migratory birds. Future projects in Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach (refer to Section 3.0.2, *Cumulative Impacts*) would also be expected to remove and replace landscaped trees, shrubs, and other non-native

ground cover. However, as with the proposed Project, these projects would be required to comply with Federal and State regulations pertaining to the protection of migratory birds, including the MBTA and/or the California Fish and Game Code. Additionally, any cumulative projects with the potential to impact federally listed species, State-listed species, or sensitive natural communities would require an Incidental Take Permit from the USFWS and/or CDFW (refer to Section 3.3.3, *Regulatory Setting*), which would require the preparation of a Habitat Conservation Plan and associated mitigation to offset any such impacts. With the proposed landscape plan and the implementation of MM BIO-1 the proposed Project *would not substantially contribute to cumulatively considerable impacts*.