

**CALIFORNIA COASTAL COMMISSION**

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# Th17a

## ADDENDUM

DATE: July 11, 2022

TO: Coastal Commissioners and Interested Parties

FROM: South Coast District Staff

SUBJECT: **ADDENDUM TO ITEM Th17a, CDP AMENDMENT NO. 5-91-286-A13 FOR THE COMMISSION MEETING ON THURSDAY, JULY 14, 2022.**

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This addendum is designed to achieve the following objectives. First, in Section I, Commission staff updates the record by supplementing it with correspondence that was received after publication of the staff report. Section II provides responses to issues raised in the recent correspondence, and Commission staff proposes the Commission incorporate these responses into its findings.

### **I. CORRESPONDENCE RECEIVED**

The Commission has received three (3) letters in support of the proposed project, and eleven (11) letters in opposition, mainly from nearby residents and homeowners. The letters in opposition generally assert the following: (1) that the proposed project does not increase coastal access in conformance with Chapter 3 policies of the Coastal Act; (2) that the proposed project would lead to further geologic instability in the future along the west rim of the canyon; and (3) that proposed project does not fulfill the obligations imposed under CEQA, and that additional environmental studies should be required.

The Commission had also received additional correspondence prior to publication of the staff report dated June 30, 2022. These are included on pages 2 – 45 of the correspondence available on the Commission's website at the following address: <https://documents.coastal.ca.gov/reports/2022/7/Th17a/Th17a-7-2022-correspondence.pdf>.

## II. RESPONSE TO COMMENTS

The following is added as a **Response to Comments** section to the staff report dated June 30, 2022 (as section I on staff report page 34, thus renumbering the CEQA section as section J):

The Commission would like to clarify that the proposed Friends Street Trail constitutes “coastal access” by virtue of connecting to existing public recreation areas within the Coastal Zone, even if it is not currently proposed to directly lead to Will Rogers State Beach or other public areas immediately along the coast (although it is anticipated that such a connection will be made in the future). It is not expected that the development proposed under this permit amendment would adversely impact traffic flow in the nearby residential neighborhood, as there is approximately 500 feet of street parking along the stretch of curb near the proposed Friends Street Trailhead that does not front residential development, and the City will be required to study the option of providing additional parking at the south (PCH) side of the canyon.

With regard to the assertions raised in the correspondence by the neighboring residents, that the project does not increase coastal access in conformance with Chapter 3 policies of the Coastal Act, and that park areas in the Pacific Palisades area are a nuisance and pose public safety risks, the Commission has made substantive findings concerning Public Access and Recreation in the staff report dated June 30, 2022. Through Special Conditions, the applicant must install additional conspicuous signage showing the hours of recreational use of the park from dawn to dusk. The City is also required to maintain all Potrero Canyon park trails, including the Friends Street Trail, in good order and repair for public use, as well as upkeep of signage, fencing, parking, restrooms, trash collection, and other visitor amenities in a manner that will enhance visitors’ experience and direct visitor thru-traffic in a controlled manner. The requirement of the underlying permit for a lateral public trail connection with PCH is still in effect, and as of July 5, 2022, the City is coordinating with Caltrans to acquire the necessary permits for the lateral trail. Through this amendment, the City is directed to analyze the feasibility of a project alternative that also includes construction of the vertical trail across PCH, and a parking lot and restroom facility at the south (PCH) end of the canyon. A deed restriction, which the City must record if any Potrero Canyon trail property is to be conveyed, will maintain enforceability of these Special Conditions.

In terms of the issue raised that the proposed project would lead to further geologic instability in the future along the west rim of the canyon, several letters of correspondence mentioned that construction of the Friends Street Trail, as well as the increased traffic it may bring, will exacerbate damage to an already geologically unstable and fragile area. There were several references and discussion of the 1950s landslide and blowout at the Friends Street Trailhead site. The Commission would like to reiterate that Potrero Canyon is the site of one of the largest canyon fill projects along the California Coast, and actions have been taken by the City, and Special Conditions have been imposed by the Commission, to minimize the inherent geologic hazards of development common to this area (e.g., landslides, flooding, and erosion). The fill project was undertaken to place additional buttress fill and wedges of earth extending up the canyon walls, cumulating in more than 3 million cubic yards of total fill, to protect residential development along the canyon rim and to stabilize the canyon

slope. While the Friends Street Trail is to be constructed atop exposed soils along the graded slope, Special Conditions 5, 13, 17, and 23 have been previously imposed to ensure that grading is performed in a manner that minimizes landform alteration and geologic instability, and that erosion and siltation is controlled as to avoid downstream impacts at the bottom of the canyon and in coastal waters. **Special Conditions 8, 21, 29, and 30** require the applicant to incorporate modifications to the irrigation and drainage system as to minimize uncontrolled runoff, impacts to the graded slope, and leaching of pollutants and contaminants (such as plastic). All drainage elements and components of the trail will be required to be visually compatible with existing park infrastructure and the surrounding landscape, will be in conformance with the latest Geotechnical Investigation Report (prepared by URS, dated February 2010), and is conditioned to not be designed or sited in any way that would contribute significantly to erosion, geologic instability, or destruction of the site. In any case, the applicant must submit revised final grading and landscaping plans in conformance with the latest geotechnical investigations and recommendations pursuant to Special Conditions 5, 16, and 23, in order to ensure geologic stability of the site in accordance with all geotechnical and engineering requirements.

Finally, recent correspondence requested the applicant to conduct additional environmental studies and submit new CEQA documentation. As discussed in the staff report dated June 30, 2022, the City of Los Angeles prepared a [Final Environmental Impact Report \(FEIR\)](#) in 1985 for the development, and the City, as lead agency, has found the FEIR to be sufficient for all work proposed and undertaken in the Potrero Canyon Park Development Project. In addition, under Section 15251(c) of Title 14 of the California Code of Regulations, the Commission's CDP regulatory process has been certified as the functional equivalent to the CEQA process. The Commission's Special Conditions serve to impose requirements to mitigate and lessen any significant adverse effect which the activity may have on the environment, in conformance with Section 21080.5(d)(2)(A) of CEQA.