

<i>COMMENTS</i>	<i>RESPONSES</i>
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The Endangered Habitats League

Dedicated to the Protection of Coastal Sage Scrub and other Threatened Ecosystems
 Jess Morton, Treasurer, 787 West 4th Street, San Pedro, CA 90731 (310) 832-5601

April 20, 2004

Mr. Joel Rojas
 City of Rancho Palos Verdes
 Department of Planning, Building and Code Enforcement
 30940 Hawthorne Blvd.
 Rancho Palos Verdes, CA 90275

Re: Draft NCCP EIR

Dear Mr. Rojas,

Thanks you for this opportunity to comment on the Draft EIR for the NCCP Subarea Plan. We believe the NCCP can provide substantial and lasting protection for many of the plants and animals that have no other chance of survival in our area. As described in the EIR, the physical setting of the NCCP preserve provided by the proposed alternative is very good. There are, however, three points which will affect the success of the preserve to a greater or lesser degree.

First and foremost is how well the still-to-be-completed Public Use Management Plan (PUMP) fits the biological needs of the preserve. We believe that unless the PUMP is carefully worked out, the underlying motivations for the NCCP itself will be put at risk. Since these are the basis on which substantial funding for necessary land acquisition depends, no overall evaluation of the NCCP can be given until the PUMP is available for public review.

Second, the integrity of the NCCP depends in part on how well the wildlife corridor through the Lower Filiorium property functions. The principal difference between Alternatives A and C is here. In Alternative A, a wide link between the major part of the NCCP preserve and Abalone Cove would be provided through acquisition of the Lower Filiorium property. In Alternative C, there is the tacit presumption that an adequate corridor can be maintained while allowing for substantial development and as-yet-unknown modes of public usage. This is clearly problematic. We do not believe that failure of this corridor would doom the NCCP preserve to failure, however, a provision should be spelled out somewhere in the NCCP documentation for monitoring effects and remediating damage.

Third, the ultimate biological success of the NCCP preserve will depend on how well it manages to provide permanent habitat for both covered and non-covered species. In other NCCP comments, we have noted the importance of protecting our possibly-endemic square-spotted blue butterfly. The Draft EIR notes how detrimental non-native ants are to native species in coastal sage scrub and other habitats. By implication, we should be planning how to

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EHL 1

EHL 2

EHL 3

Comment 1

Comment noted.

Comment 2

The proposed habitat linkage through Lower Filiorium is consistent with regional Reserve design guidelines and the Wildlife Agencies have reviewed the design. All habitat linkages between large habitat areas of the Reserve are consistent with NCCP habitat linkage design guidelines. Restoration and management of habitat linkage areas are a priority of the Subarea Plan. Both Lower Filiorium and the recreational area support minimal native vegetation, thus habitat restoration will be important to improve the linkage function of these areas.

Comment 3

The Plan focus is the conservation of covered species and their habitats. Less sensitive species that co-occur with covered species benefit from the proposed habitat conservation. The covered species list can be amended at a later date should a species be listed and the Plan adequately addresses the needs of the species being added. The practicality of managing for native ant populations has not been assessed for this Plan. No proposed covered species is dependant on native ants for their continued existence in the Planning area. There are no developed or improved public recreational facilities on any of the properties proposed to be included in the Reserve. All of the areas proposed to be included in the Reserve presently support passive recreational uses such as trail use and picnicking. Although there are some publicly dedicated trails, most of the trails on the lands slated to be in the Reserve are unimproved, non-dedicated trails, which are used by hikers, bicycle riders and equestrians. There is no data available as to how many persons currently use the trails within the lands that are proposed to be in the Reserve. However, the creation of the Reserve will not create a significant impact to the existing passive trail use, as the creation, maintenance and public use of a trail system consistent with the City's Conceptual Trail Plan is allowed within the Reserve. Portions of this response have been added to EIR Section 5.3.1.

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preserve native ants and their dependent wildlife. It is likely that there are many additional species to which we should be paying attention. We would like to see some mechanism built into this NCCP that encourages greater in-depth understanding of our preserve, the species it contains, and how best to protect them.

EHL 3 (cont'd)

In summary, the Endangered Habitats League feels that the Palos Verdes NCCP has great promise to fulfill the fundamental principles of the NCCP program. We have been pleased to be part of the effort since the beginning, and look forward to a successful outcome.

Sincerely yours,



Jess Morton
Treasurer