

| <i>COMMENTS</i> | <i>RESPONSES</i> |
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Sunshine  
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(310) 377-8761

April 5, 2004

Joel Rojas, Dir of Planning...  
City of Rancho Palos Verdes

RE: 3/2004 NCCP Draft Environmental Impact Report.

Dear Mr. Rojas;

Given the emphasis on preserving and creating habitat corridors, the DEIR appears to be missing two things. One is how the corridors connect, or don't connect across adjacent cities. The other is an alternative which addresses the impacts on the corridors should more of the "flat" areas near the perimeter of the reserve be proposed as open space used for active recreation and agriculture.

In 1986, the scope of the proposed Palos Verdes Loop Trail was expanded into the "Peninsula Wheel Network" also called the "Peninsula Loop and Spoke System. This concept was proposed primarily with the objective of creating habitat corridors which interconnect all over the hill. See Appendix 2 of the RPV Conceptual Trails Plan (CTP). The EIR should illustrate how the proposed reserve area contributes toward that goal. This illustration would assist with assigning priorities to the various corridors. This illustration could also point out where habitat circulation tunnels would be appropriate under roadways.

SUNSHINE 1

On both privately and publicly owned land, the proposed project includes areas that could be relatively inexpensively improved for active recreation. Along the lines of having excluded Lower Pt. Vicente, the "Mexican Village" and the "Sandbox", I suggest that at least "Peacock Flats" and the "northern terrace" of Upper Pt. Vicente Park also be considered for exclusion. I have been told that it is a simple process to add land to the preserve. Staff made an attempt at figuring out what proportion of the City's existing parkland is used for each of the various types of recreation. This is the place where that exercise should be completed in minute detail and comparisons included in percentages for the "ideal" (per the telephone survey), what is existing and each of the alternatives (including mine).

SUNSHINE 2

As I mentioned in my testimony on January 20, 2004, the boundaries of the reserve appear to be located based on a political "ask for all the land that isn't already spoken for" attitude as opposed to purely biological interest. Alternative A speaks up for the landowners' interests. I am now speaking up for the active recreation and other than biology education interests. Since some people feel that the Task Force's list of facilities for Upper Pt. Vicente is "too dense", then this is the place and time to look at other locations for these facilities.

Sincerely,

**Comment 1**

Details of trail alignments through the Reserve will be documented in the PUMP. Retrofitting roadways with culvert under-crossings is not being proposed in the Subarea Plan.

**Comment 2**

The Hon property, including "Peacock Flats" is part of the large contiguous habitat that is the core habitat area which is considered a regionally significant biological resource area. Development within this relatively large area is counter to the Reserve guidelines developed for the NCCP. Habitat fragmentation and increased edge effects would result from such a Reserve design and would not be acceptable to the Wildlife Agencies or the environmental community. The upper portion of Pt. San Vicente supports the most productive California gnatcatcher breeding habitat within RPV, based on a five-year study conducted by Dr. Atwood. The proposed Reserve design (Alternative C) is consistent with the NCCP guidelines and still allows for development outside the Reserve and neutral lands, including recreational facilities.