

Biology Department
University of California
Los Angeles, CA 90024
28 March 1984

Mr. Paul L. V. Campo
Director, Natural Resources Office
Marine Corps Base
Camp Pendleton, CA 92055

Dear Mr. Campo,

I am the current chairman of the Pacific Seabird Group, and in early February I received, from Rufus C. Young, a copy of the "Preliminary Draft, Operational and Environmental Considerations of the American High Speed Rail Corporation's Proposal to Build and Operate a High Speed Rail System on a Portion of Marine Corps Base, Camp Joseph H. Pendleton, CA.". The Pacific Seabird Group was invited to send any suggestions or comments on this preliminary draft to you. I submitted the proposal to several of our members that are particularly familiar with some of the avian species mentioned in the proposal and also with general problems concerning conservation of marine and estuarine habitats in California. What follows are the comment of two individuals, slightly edited:

"The idea of a Bullit Train as proposed represents more than a threat to particular species. It represents a very real larger threat to already dwindling and reduced coastal ecosystems. The issue is one of ecosystem or habitat preservation. From this viewpoint, and not even considering the needs for national defense, etc., the proposal jeopardizes the remaining coastal habitats in a way far more serious than the immediate impacts (which are serious enough). It represents an ultimate threat of total development to the wild areas encompassed by Camp Pendleton. Military uses of the land have been compatible with the natural values; indeed, the marines have enhanced and protected those values through stewardship. Thus any threat to the integrity of the military uses ultimately jeopardizes the natural values. This is an odd, but workable arrangement that seems to be the best current way to insure that the natural values of the land remain intact.

I would, therefore, oppose the Bullit Train route as proposed. It is imperative that for the time-being, the military uses and federal stewardship of that

land be maintained. An alternate, inland route (such as along interstate 15) thru lands already under private ownership will ultimately provide the greatest benefit to society."

"My major concern is that this project is another incremental habitat loss that daily destroys rapidly vanishing habitats throughout coastal Southern California. The most obvious example is the loss and degradation of coastal salt marshes and the number of associated species listed as rare, threatened, or endangered. Very little coastal marsh remains throughout Southern California. Some of the best remaining marsh/estuaries are found from Newport Bay to north of Mission Bay; adjacent developments and water quality problems, however, are having negative impacts on them. The potential impact to the listed species, riparian vegetation, and marsh/estuaries should be viewed on a regional scale and not just on a local site basis.

Little mention is made in the proposal of the importance of coastal sage scrub habitat. Within the U.S., the "California" Black-tailed Gnatcatcher (Polioptila melanura californica) occurs only in coastal sage scrub habitat from Ventura Co. to the Mexican border. Much of this type of habitat has been destroyed, and this bird is on the State's Priority 2 list of species of concern in California. Jon Atwood (Western Birds 11:65-78, 1980) has documented the decline of this bird and identified habitat loss as the primary cause. Atwood makes the following statement about this species on Camp Pendleton:

"Californica's range has been severely reduced in San Diego County by urban and agricultural expansion. Oberbauer (1979) suggested that up to 70% of the county's original coastal sage scrub vegetation has been destroyed or modified and...further reduction of this habitat is imminent. An extensive portion of suitable habitat persists in northwestern San Diego County, where sizable natural areas have been protected from development because they are located in the United States Marine Corps' Camp Pendleton (emphasis mine). Virtually all other known sites of recent occurrence are located near rapidly expanding urban center such as Vista, Escondido,..."

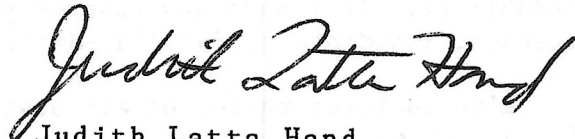
As the two assessments above make clear, a bullit train proposal must be viewed as part of a statewide problem of rapid loss of several habitat types found at Camp Pendleton. On a national scale, moreover, there is also

increasing concern over the loss of wetlands, and coastal wetlands pose a particularly acute problem since they constitute only approximately 5% of all national wetland areas and they are rapidly being lost or altered. It is the recommendation of our organization that

1) any evaluation of the feasibility and desirability of the proposed corridor for a bullit train through Camp Pendleton must consider the value to the State of California of damage to or loss of this habitat and

2) that a combination of national security and biological interests argue strongly against the bullit train corridor indicated in this proposal.

Sincerely,

A handwritten signature in cursive script that reads "Judith Latta Hand". The signature is written in dark ink and is positioned above the printed name and title.

Judith Latta Hand

Chairman, Pacific Seabird Group

cc: E. Shirley
K. Vermeer
D. Anderson