

O-4 BUENA VISTA AUDUBON SOCIETY

Comment Letter O-4

Buena Vista Audubon Society
PO Box 480
Oceanside, CA 92049-0480

April 15, 2018

Dear Mr. Mattson,

Sent by email to: Gregory.Mattson@sdcountry.ca.gov

I am writing on behalf of the Buena Vista Audubon Society to comment on the Draft Environmental Impact Report for the Village 14 project in South County. The affected Proctor Valley parcels are among the most ecologically important in San Diego County, essentially inholdings within the San Diego National Wildlife Refuge, and need maximum care and protection. Among the many project impacts listed below, the project threatens the survival of Golden Eagles in an important territory for this species.

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The following is a list of the most significant DEIR deficiencies which should be corrected before the document is finalized:

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- 1. While parts of the proposed project were anticipated for development in the MSCP, other parts were instead included in the MSCP preserve. This places the entire MSCP assembly and mitigation program in jeopardy.
2. The DEIR wrongly applies the Biological Mitigation Ordinance to such parcels, violating the MSCP.
3. Impacts to the Golden Eagle, Quino Checkerspot butterfly, and Spadefoot Toad were not disclosed or mitigated. Quino habitat extent and quality were incorrectly portrayed, Spadefoot Toad impacts are much more severe than described, and habitat loss due to edge effects were not disclosed for the eagle.
4. Impacts from pollution to the Otay Lakes drinking water reservoirs were not disclosed or mitigated.
5. GHG mitigation relies upon a fatally flawed carbon offsets scheme that will not address impacts.
6. Visual impacts to an important scenic landscape only analyzed in a cursory, inadequate manner.
7. The DEIR fails to disclose serious fire hazards and the inability to evacuate residents on overcrowded roads in the very foreseeable event of a wind-driven wildfire.
8. Of great concern, the DEIR fails to protect current and future use of the area by Golden Eagles in the Village 14 area through avoidance.
9. Taken in whole, this inadequate assessment is unacceptable and fails to utilize all relevant data available to the County and the developer about the past, present, and future use of Golden Eagles and other at-risk species in this area.
10. These failures are significant and the County must require a significant change in the project to avoid impacts to Golden Eagles and other environmental impacts.

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Thank you for consideration of our views on this important matter that affects the long term sustainability of our local wildlife.

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Sincerely,

Joan Herskowitz
Conservation Chair
Buena Vista Audubon Society

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