



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

April 12, 2010

Jerry Hittleman, City Planner
City of Oceanside
300 North Coast Highway
Oceanside, California 92054

SUBJECT: FINAL EIR FOR FORMER SOUTH COAST QUARRY AMENDED RECLAMATION PLAN

We have reviewed the Amended Reclamation Plan and Final EIR and find that the Amended Plan has been modified to substantially reduce many of the environmental impacts of the original plan.

However, one particular item included in our comment letter dated November 20, 2008 stands out as not being addressed. In our letter, we requested that a minimum 100-foot biological buffer be included in the plan to mitigate impacts on biological resources. In the written Responses to Comments (pg B-46), it is stated "Restrictions related to access and land uses within the habitat areas associated with the reclamation work will be defined through the required conservation easements including the 100-foot biological buffer, and will address protection of on-site biological resources". This statement provides no assurances and is very unclear as to when and if this would ever occur.

In the Biological Technical Report of the EIR for Refined Alternative 3 (page 40, under Section 6. Mitigation), the discussion of wetland mitigation talks about habitat creation ratios but includes no mention of wetland biological buffers. The discussion of Diegan sage scrub mitigation indicates approximately 80 feet of the 100-foot biological buffer will be revegetated as part of the Reclamation Plan with the balance (20 feet) revegetated in conjunction with any future end use and upon final grading for the end use. In both cases, there is no indication or assurance that conservation easements would be implemented as a condition of the Reclamation Plan. The biological buffer is an important protection of wildlife habitat and is essential to mitigate biological impacts of the Amended Plan. Without the inclusion in the Plan of biological buffers, it cannot be said that biological impacts have been fully mitigated.

In our letter we also called out the need for a minimum 50-foot planning buffer, but the Amended Plan indicates that this will be deferred until the property is developed. Although not as essential as the biological buffer, the planning buffer also protects the habitat from the myriad direct and indirect impacts of the adjacent development. It is disappointing that the planning buffer is not secured at this time.

In conclusion, although the Amended Plan is an improvement over the original plan, biological resources have not been mitigated until habitat buffers are included as required mitigation of impacts.

If you have any questions, I can be reached at (760) 942-5167.

Respectfully,

Joan Herskowitz
Co-Chair, Conservation Committee
Buena Vista Audubon Society