



Buena Vista Audubon Society
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California Coastal Commission
San Diego Coast District Office
Toni Ross, Coastal Planner
7575 Metropolitan Drive, Ste. 103
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August 2, 2008

RE: City of Carlsbad LCP Amendment No. 01-06A (HMP Implementation Plan)
and No. 01-06B (HMP/General Plan Amendment)

Dear Ms. Ross:

This letter is written in support of the Commission staff reports on the above two items on the August 7, 2008 Commission agenda.

Item No. 01-06A is a request for modifications to the HMP Implementation Plan in order to implement the approved Habitat Management Plan (HMP) and other Land Use Plan provisions. The purpose of the HMP is to provide a comprehensive, city-wide program to preserve the diversity of habitat and protect biological resources while allowing for development within the City. However, staff has determined that the proposed modifications are inadequate to implement all the goals and requirements to properly manage sensitive resources within the City of Carlsbad HMP Preserve. In particular, missing components of the proposed amendment include, but are not limited to: 1) lack of preserve management plan; 2) lack of resources; 3) no clearly identified communication or defined responsibilities between the City and the Resource Agencies and the Commission; 4) no identification of mitigation sites/opportunities within the Coastal Zone; 5) lack of appropriately defined Open Space requirements; and, 6) failure to require the Commission's review of specific guidelines that may lead to undesired changes in how the HMP is managed. We agree with the staff report determination that the proposed amendment is inadequate and inconsistent with the goals and requirements of the HMP and should be denied. We look forward to the City's future submittal of a revised proposal that addresses the issues and deficiencies raised in this staff report.

With regard to Item No. 01-06B which is a request to amend the Land Use Plan and Implementation Plan to reflect changes to 51 parcels all within the Hardline Preserve area of the HMP. The intent of this LCP Amendment is to further protect these preserved lands from future development. We agree with the staff report recommendation to approve this amendment.

We strongly urge you to support these staff report recommendations which will ultimately result in the long-term protection of native habitat and biological resources in the City of Carlsbad. Thank you for your consideration of our views on this important issue.

Sincerely,

Joan Herskowitz, Conservation Committee
Buena Vista Audubon Society