



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

November 27, 2006

Honorable Members of the City Council
City of Oceanside
300 N. Coast Highway
Oceanside, CA 92054

**RE: Opposition to proposed Robertson Concrete Batch Plant
2457 Industry Street; Oceanside, CA**

Dear Honorable Members of the City Council:

On behalf of the 1,200 members of the Buena Vista Audubon Society, I wish to record our organization's opposition to the Robertson Concrete Batch plant proposed for 2457 Industry Street in Oceanside.

We believe planned operations for the proposed plant would result in ongoing injury to the hydrologic functioning and biologic resources of the adjacent Loma Alta Creek. These impacts would include:

- *Degraded water quality in the stream due to uncontained and untreated contaminated runoff from the site;
- *Risk of catastrophic water and soil contamination from the on-site storage of 12,000 gallons of fuel;
- *Loss of water table and increased runoff reaching the creek as a result of paving over the existing pervious ground surface at the site;
- *Increased air pollution from air borne particulates as a result of the handling and storage of uncontained concrete components, as well as the daily exhaust discharge from numerous large equipment engines;
- *Inadequate buffer zone between development and Loma Alta Creek; and,
- *Excessive noise generated from uncontained operating equipment.

We find it difficult to understand the decision to issue a Negative Declaration on this project given the extensive environmental review and mitigation requirements imposed on NCTD for their Sprinter project which runs along the southern border of this property. The "Final Biological Resources Report for the Oceanside-Escondido Rail Project" (prepared for NCTD by Dudek & Assoc., June 04) found ten pairs of the Least Bell's Vireo, a federally listed endangered bird species, on territories located less than ½ mile upstream from this proposed project site. The dense willow thicket that characterizes the narrow strip of vegetation along Loma Alta Creek that borders the project site, represents potentially suitable nesting territory for this expanding population.

The survey also recorded a federally listed threatened California Gnatcatcher within 500' of the project site. While the survey shows that Loma Alta Creek in the immediate vicinity of the project site provides suitable habitat for several additional plant and animal species of special concern, the primary importance of this narrow riparian corridor for wildlife is as a dispersal and migration link to other larger habitats upstream and downstream. The lack of adequate buffer between the proposed development and Loma Alta Creek would further exacerbate negative edge effects on plant and animal life. This wildlife corridor has been identified as a critical component in the Oceanside Sub-Area Multiple Habitat Conservation Plan.

Industry Street in the vicinity of this project site is a mix of industrial and commercial uses. The old style, relatively unregulated, dirty industrial operations of the past have been slowly giving way to a new breed of clean industry that blends well with the nearby mix of commercial and residential land uses. This concrete batch plant project represents a throwback to a bygone era, and a giant step back for the city in its attempt to revitalize its economic base with a more modern and vibrant business district.

We urge the City of Oceanside to join other North County cities that have recently rejected this ill-designed and poorly planned project.

Sincerely,

Andrew Mauro, Conservation Chair
Buena Vista Audubon Society

Copy: Mr. Jerry Hittleman, Director
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City of Oceanside
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