



Buena Vista Audubon Society
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SUBJECT: COMMENTS ON DRAFT EIR FOR MELROSE DRIVE EXTENSION

These comments are written on behalf of the Buena Vista Audubon Society, an organization dedicated to the preservation of native habitat and wildlife, and supported by its membership of 1,600 households predominately from North County communities. The project under review includes three potential alignments for construction of an approximately 3,000-foot roadway extension of Melrose Drive to connect the existing terminus of Melrose Drive, at Spur Avenue, to North Santa Fe Road, as well as widening approximately 1,900 feet of the existing section of Melrose Drive, located south of North Santa Fe Avenue.

We have reviewed the Draft EIR for the above project, visited the sites involved, and have the following comments.

Project Description and Need

The proposed road would lead from Santa Fe Drive through a relatively undeveloped area which currently contains areas of sensitive habitat, including wetlands, as well as agricultural uses, such as farms and plant nurseries. Considering the small neighborhood served by the road and the impacts to sensitive biological resources and parkland, it is not clear why a 6-lane road is necessary or warranted at this location. It would, in fact, open up a large undeveloped area along I-76 and north to new housing development. Although the DEIR states that there would be no growth induction resulting from this project because there is no associated zoning changes, zoning changes will follow any new road that facilitates access to an undeveloped area. Therefore, growth induction impacts have not been adequately addressed in the DEIR. Secondly, although the northern extension of Melrose Drive to River Road is identified in the Circulation Element, why is the entire road extension project (both segments) not addressed in the DEIR? CEQA requires that projects not be analyzed for environmental impacts on a piecemeal basis but as one whole project so that cumulative impacts can be adequately addressed.

Loss of Parkland

All three alignments will result in the loss of parkland in Guajome County Park, ranging from 3.6 to 8.4 acres. Guajome Park is an important County wildlife area containing a variety of native habitats and an extensive series of wetlands that support sensitive and endangered species. In addition to the loss of valuable parkland, the project would result in the loss of wetland and upland habitat. It is a very bad precedent to locate roads through parkland, as these lands have been set aside to sustain native wildlife for future generations and to provide recreational opportunities for community residents. Although the Eastern-most alignment (B) is

preferable because it would avoid parkland losses in the northeast area of impact, an intersection reconfiguration at Melrose and Santa Fe still needs to be incorporated into the proposal to minimize wetland and parkland impacts to the greatest extent feasible. At a minimum, alternate alignments and road widths should be examined that avoid loss of parkland. If after all alternatives have been reviewed and the least impactful alignment results in a loss of parkland, then compensation for that loss should be at a very high ratio because of the local and regional importance of this public park.

Impact to Biological Resources

The project would result in impacts to sensitive coastal sage scrub habitat, and mitigation under Rule 4(d) is proposed by preservation of similar habitat in the unincorporated area. This is unacceptable because mitigation lands should be located in the general area of the impacts, so as to preserve habitat with similar climatic parameters. In addition, it is our understanding that the resource agencies have prohibited mitigation of habitat impacts in cities to compensate for similar habitat in the unincorporated area.

All three alignments would result in impacts to wetlands and the minimum 50 ft. buffer needed to protect this habitat. The DEIR should examine an alternative that includes a reconfiguration of the intersection of Melrose and Santa Fe Road to first avoid, and if not possible, then to minimize those wetland impacts. The correction of existing conditions of the wetland at that intersection resulting from invasives, street runoff and trash, should be a condition of the proposed project, as well as ongoing maintenance of the wetlands, to reduce impacts to wildlife. Also, an alternative described in the DEIR includes a bridge that would reduce impacts to a wetland area, but it is not clear how this would link up with the road alignment. This needs to be clarified so impacts can be evaluated.

As mentioned above, the alternatives analyses are not adequate as they don't include the range of alignments that would avoid park and biological impacts, or that avoid or minimize impacts to the greatest extent feasible. In addition, the DEIR does not adequately address the project's impacts on climate change. Therefore, the DEIR does not meet all CEQA requirements and should be revised accordingly.

Thank you for your consideration of our views on this matter. If you have questions, I can be reached at jmherskowitz@yahoo.com or (760) 942-5167.

Sincerely,

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