



**Buena Vista Audubon Society**  
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**September 28, 2015**

Winston Zack, Project Manager  
Department of the Army  
Los Angeles District, U.S. Army corps of Engineers  
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Sent by email: [Winston.S.Zack@usace.army.mil](mailto:Winston.S.Zack@usace.army.mil)

**SUBJECT: Campus Park West Development Section 404 Permit Application, #SPL-2013-00582-WSZ**

Dear Mr. Zack:

I am writing on behalf of the Buena Vista Audubon Society (BVAS) with our comments on the Campus Park West application for a permit under Section 404 of the Clean Water Act. This permit is required for projects where it is anticipated that there will be impacts to the nations rivers, streams or wetlands, as prescribed under Section 404 of the Clean Water Act. BVAS is an environmental organization with over 2,000 member households predominantly in northern San Diego County.

The project is located on 118 acres in Fallbrook, east of I-15 at the intersection with I-76, including property both north and south of I-76. The proposed development includes 283 multifamily residential units, commercial and industrial/business professional uses. The existing onsite resources include 9.16 acres of wetland waters of the U.S., 3.56 acres of these wetlands will be impacted by the project. The onsite wetlands are associated with Horse Ranch Creek which drains directly into the San Luis Rey River that adjoins the property. The project site contains 19 acres of critical habitat of the federally endangered Least Bell's Vireo, of which 13 acres would be permanently impacted. It also contains 5.15 acres of critical habitat of the federally endangered Southwestern Willow Flycatcher, of which .28 acres will be impacted. Surveys indicate that both of these endangered species occupy habitat onsite.

Our major concern with this project is the extent of the loss of wetlands and habitat of endangered species dependent upon those wetlands. The Army Corps public notice states that "The permit review process serves to first avoid and then minimize adverse effects of projects on aquatic resources to the maximum practicable extent". Although mitigation for losses is proposed, from a review of the lot design, it doesn't appear that the project layout is sensitive to the constraints of the property, and that further avoidance could and should be incorporated into the project design.

The San Luis Rey River is the centerpiece of the North County MSCP Preserve. It and its tributaries need to be protected and enhanced at every opportunity, as it provides sustenance and habitat for a

variety of endangered, threatened and other sensitive species. River tributaries, such as Horse Ranch Creek, which flows through the Campus Park West project site, need to be preserved and protected from development. Considering the sensitivity of the wetlands on and offsite, this development should be redesigned to avoid impacts to a greater extent than has been done.

In addition, biological buffers are important to the function of wetland habitat and preservation of sensitive species. It is not clear from the project description that the wetlands preserved onsite will be protected by adequate biological buffers. With regard to the San Luis Rey River, although the river is immediately offsite, a necessary 1,000-foot buffer may fall within the property boundary and this should be delineated and protected from development.

Thank you for the opportunity to comment on this application. If you have questions, I can be reached at: [jmherskowitz@yahoo.com](mailto:jmherskowitz@yahoo.com) or 760-942-5167.

Sincerely,

Joan Herskowitz  
Conservation Chair  
Buena Vista Audubon Society