



City of San Marcos
Planning Commission
1 Civic Center Drive
San Marcos, CA 92069
September 2, 2016

Sent by email: planning.comm@san-marcos.net
NPedersen@san-marcos.net
Norm Pedersen, Associate Planner

RE: Comments on San Marcos Highlands Development Project, P13-009

Dear Planning Commissioners:

I am writing to you on behalf of the Buena Vista Audubon Society, an environmental organization with more than 2,000 member households in the North County coastal area. Our mission includes education and advocacy to preserve wildlife and native habitat in the region. We have reviewed environmental studies associated with the 293-acre San Marcos Highlands residential development project since 2013 when we submitted our comments on the Negative Declaration, and again in 2015 when we reviewed the Draft EIR and submitted further comments during the public review period. At both times we expressed our concern that this development as proposed would have significant and unmitigated environmental impacts on sensitive wildlife species and habitats, and is not consistent with regional habitat plans and agreements.

About 52% of the project site is in the County of San Diego and 48% in the City of San Marcos. The County portion of the Highlands site is designated as a Pre-Approved Mitigation Area (PAMA) in the County's draft North County Multiple Species Conservation Program (NC-MSCP). The PAMA is designed to steer development outside the area and set up design criteria and mitigation standards for any development in the area. The city portion of the site is included in the Multiple Habitat Conservation Plan (MHCP) which also identified onsite Biological Core and Linkage Areas due to the presence of valuable biological resources. These environmental planning agreements have been designed and established to protect endangered and threatened species and their habitats. Therefore, it is essential that new development be consistent with these plans, and the San Marcos Highlands project is not.

The project site is covered with sensitive coastal sage scrub (CSS) habitat in which the federally threatened California Gnatcatcher was identified, and wetlands habitat. The project will remove 77 acres of CSS and impact the wetlands habitat that runs through the property. It will also severely constrain wildlife movement between two of the largest remaining open space areas in northern San Marcos and the County.

The wildlife corridors proposed in the project are inadequate based on wildlife studies of other areas. The corridor along the north side of the site is a crucial linkage between the conserved habitat on the southeast side of the project and the conserved areas to the northwest, such as the Buena Creek Gnatcatcher Conservation Bank. This corridor is 400 feet wide at its narrowest points, not including fuel modification zones, substantially less than the minimum width of 1,000 feet for a sustainable wildlife corridor normally required by the resource agencies. Wildlife also moves along the creek, which flows southwesterly from the northern side of the site, and these riparian corridors are impacted and not buffered enough to encourage and accommodate wildlife movement. Another problem is the inadequacy of the wildlife under-crossing of a road proposed to be built over the creek as it is too long and narrow for deer to realistically use.

What is the point of the considerable resources expended by government agencies on environmental planning if these are disregarded when actual development proposals come forward? Environmental planning is important for the sustainability of wildlife in our region and it is essential that new development be designed to accommodate the biological constraints of any particular site.

In conclusion, we believe that the project is inappropriate for this location, and would have significant and unmitigated environmental impacts. Therefore, we request that you deny approval of the EIR and the San Marcos Highlands project, and suggest that the property owner consider a project alternative that does not significantly impact biological resources. The California Environmental Quality Act (CEQA) requires alternatives analyses to examine whether impacts can be avoided or minimized and still meet project objectives. There are several that have been included in the San Marcos Highlands EIR, namely the County Zoning Alternative, Reduced Project Alternative, Increased Habitat Linkage Alternative, and Environmental Superior Alternative, that could be examined further to determine if they could reduce significant impacts identified in the proposed project.

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

Sincerely,

Joan Herskowitz
Conservation Chair
Buena Vista Audubon Society