

Buena Vista Audubon Society  
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January 19, 2015  
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Sent by email to:

Ms. Amy Fousekis, Principle Planner  
Planning Division, City of Oceanside  
300 North Coast Highway  
Oceanside, CA 92054

Subject: Comments on Mitigated Negative Declaration for Digital Billboard on I-78  
(ADM#13-00011)

Dear Ms. Fousekis:

The following are comments on the above project on behalf of the Buena Vista Audubon Society, an environmental organization with 2,100 member households predominately located in North County. We administer educational programs at our nature center in the City of Oceanside and our primary focus is on preservation and enhancement of the natural environment and wildlife habitat in the vicinity of the Buena Vista Lagoon and the surrounding watershed.

The project is the installation of a dual-sided, approximately 48-ft. wide by 18-foot tall, digital sign on a steel support about 40 ft. above the ground. It would be located on a slope adjoining the north side of I-78 in the City of Oceanside and about equidistant between the El Camino and College Boulevard exits on the freeway.

From our review of the project description and the Mitigated Negative Declaration (MND), it appears that the project as proposed would have significant and unmitigated environmental impacts. The following is a summary of our concerns with the proposed project and the environmental review in the MND.

#### Biological Resources

Installation of the sign will result in the clearing and grading of .1 acres of Diegan coastal sage scrub habitat occupied by native wildlife, including the federally threatened California gnatcatcher. In addition, the sign will emit substantial night lighting on about 1.7 acres of this habitat that surrounds the sign. Although the proposal includes some limited mitigation, the native habitat on the project site is particularly important due to the fact that it currently supports gnatcatchers, and that it is located in and adjacent to the

Wildlife Corridor Planning Zone (WCPZ) and the City's priority conservation area identified in the Multiple Habitat Conservation Program (MHCP) and City's draft Subarea Plan (SAP). The purpose of the WCPZ is to establish a gnatcatcher linkage to adjoining suitable areas for continued genetic and demographic connectivity between gnatcatcher core areas on Camp Pendleton to the north and Carlsbad to the south. The draft SAP states that properties in the WCPZ must be protected to maintain and enhance wildlife habitat value and connectivity for wildlife movement. The onsite gnatcatchers will likely produce offspring that will disperse into the WCPZ linkages, and the project site is the most likely place for gnatcatcher movement across I-78 between the WCPZ and the Buena Vista Creek Ecological Reserve to the south. The initial study fails to adequately evaluate the importance of these linkages. Protection of the WCPZ is important to achieve the goals of the MHCP.

In addition, night lighting from the sign will illuminate 1.7 acres of coastal sage scrub which is a significant portion of the gnatcatcher habitat in the area. The lighting nearest the sign will be 100 times the illumination of a full moon and scientists have determined that alteration of natural light patterns can lead to increased predation, disorientation and disruption of inter-specific interactions. Light levels from the sign could significantly disrupt gnatcatcher breeding and could lead to territory abandonment, significantly impacting the function of the WCPZ.

#### Other Environmental Impacts - Aesthetics, Traffic Safety

With regard to the aesthetics of the sign, the MND did not analyze visual impacts on the unique and valued character of the City as perceived by residents and visitors. In addition, it specifically failed to evaluate the visual impacts from a variety of public and private spaces, including those in the Buena Vista Creek Valley to the south of the project site. The sign would be visible from public trails in the Buena Vista Ecological Reserve, the historic adobe home and El Salto Falls, and could degrade the natural and cultural experience of visitors to these sites. In addition, the valley contains hillside development and there will be future development in the valley approved but not yet built in the the City of Carlsbad which was not analyzed for visual effects. Another environmental issue associated with a digital sign at the proposed location is the potential effect on traffic safety. Driver distraction on roads is already a current issue of concern. The proposed digital sign with changing commercial messages would add another driver distraction which could result in an increase in vehicle accidents.

Due to significant impacts of the proposed project identified in the MND and inadequacy of the mitigation to reduce these impacts below the level of significance, as prescribed by CEQA, an Environmental Impact Report should be required to determine how or if these impacts can be fully mitigated.

Thank you for the opportunity to comment on this MND. If you have further questions,

please contact me at 760-942-5167 or [jmherskowitz@yahoo.com](mailto:jmherskowitz@yahoo.com) .

Sincerely,

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