



Buena Vista Audubon Society
P.O. Box 480
Oceanside, CA 92049

February 19, 2018

--Delivered Via E-Mail--

San Diego Association of Governments
401 B Street, Suite 800
San Diego, California 92101

Dear Honorable Chairperson and Members of the SANDAG Board of Directors,

Since the mid-1970s, the Buena Vista Lagoon has suffered declining water quality, accelerating sedimentation, and diminished biological productivity as a result of urbanization and impacts related to the embankments, bridges, and weir constructed within the lagoon. A baseline study of eutrophication and nutrient cycling in Buena Vista Lagoon prepared in response to a monitoring order in 2010 concluded that episodes of low dissolved oxygen and the high biomass of phytoplankton and macroalgae in the inner basins of the lagoon were symptoms of a high level of eutrophication, justifying its classification as an impaired water body under the Clean Water Act. The concluding recommendation of that study was to increase flushing and circulation within the lagoon to decrease detention of fine-grain sediments and decrease water residence time. Intertidal habitats should be favored over subtidal habitats.

This was not considered earth-shaking news for those who had been concerned about the health of the lagoon. Unfortunately, dense cattail thickets, proliferating mosquitos, summer fish die-offs, and seasonal flooding have increasingly defined the state of the lagoon in recent years. Restoration or enhancement of the Buena Vista Lagoon has now been the subject of detailed study for at least 20 years. BVAS wrote its first position paper on this project in 2003, calling for approval of a plan that would restore the lagoon to a coastal saltwater estuary and saltwater marsh system with tidal influence. All of the technical studies over the years have concluded that the saltwater alternative would best meet the stated objectives of the BVL Enhancement Project.

The BVL Enhancement Project final EIR is now being presented to the SANDAG Board of Directors with a staff recommendation for approval of the saltwater alternative. This preferred alternative would remove the weir at the mouth of the lagoon, dredge out a widened channel connecting the ocean to the RR basin, dredge out the Weir basin (owned by the St. Malo's Homeowner's Association) to make it subtidal and open water, and dredge and reconfigure the remaining basins and channels of the inner lagoon to support a coastal saltwater estuary/marsh with a tidal flushing regime. The RR trestle would become double-tracked and wider-spanned, the South Coast Hwy. would be raised and the bridge culvert widened, and the I-5 Hwy. bridge would be widened. Public access aspects of this proposed preferred alternative would include a pedestrian bridge at the inlet to the lagoon to facilitate north-south pedestrian traffic along the beach, and a boardwalk along the east side of South Coast Hwy. to provide a safe pedestrian connection between the BVAS Nature Center on the north side of the lagoon in Oceanside and Maxton Brown Park on the south side in Carlsbad. The boardwalk and an additional

proposed view deck on the RR Basin with access provided by a trail along the recently-acquired BVAS Wetlands Reserve property would provide opportunities for public wildlife viewing and fishing access.

Benefits of the saltwater alternative over the freshwater alternative include:

Maximizes overall species diversity, including marine species that require an estuary for a portion of their life cycle

Maximizes protection of endangered species

Provides greatest habitat value per dollar

Enhances coastal saltwater wetlands, one of our most endangered habitats

Best addresses community goals of mosquito abatement, cattail reduction, and beach sand replenishment

Offers best opportunity for project implementation through mitigation funding

Provides best means to address water pollution issues and meet obligations imposed by the Regional Water Quality Board pursuant to requirements of the Clean Water Act.

Long ago, state and local authorities allowed the sand berm across the wide mouth of the Buena Vista Lagoon to be widened and stabilized and allowed to be developed as an exclusive housing enclave. The mistake was compounded when the State Lands Commission did not claim the State's ownership of the westernmost basin of the lagoon as was its right under the State constitution, and instead allowed a claim of private ownership of this lagoon basin. These historical incidents provide the context in which a small group of private landowners are now attempting to impose their will on the ultimate fate of the 220-acre Buena Vista Lagoon State Ecological Reserve. State officials and restoration planners have made a sincere effort to design a project that accommodates the concerns of this small group of land owners at the mouth of the lagoon, while still providing a project that meets the environmental and societal objectives of the restoration of the State's first Ecological Reserve. The conclusions of all the studies showing that a saltwater enhancement project would best meet every public goal and objective set forth for this project are indisputable. Nevertheless, the landowner group remains insistent that a freshwater lagoon enhancement project undertaken at public expense is the only alternative they will accept.

Buena Vista Audubon is an important stakeholder in the fate of the Buena Vista Lagoon. It has operated the Audubon Nature Center on the north shore of the lagoon since 1987, hosting and educating over 300,000 visitors with nature programs, educational displays, and tours of the lagoon. In 2016, BVAS was able to purchase a 3.5-acre parcel of land across the street from the Nature Center, with over 200 local residents contributing funds to help preserve this last-remaining undeveloped parcel of privately-owned land adjacent to the lagoon. BVAS has announced its intention to have this land restored to native habitat and incorporated within the Buena Vista Lagoon Ecological Reserve. This is what civic-minded citizens do in an effort to preserve our community's natural heritage and safeguard our quality of life.

It's time for our public officials to recognize and act upon an overwhelming public interest by approving an enhancement project that returns the Buena Vista Lagoon to its historic role as a coastal saltwater estuary and marshland.

Sincerely,

Andrew Mauro, Director (on behalf of the Buena Vista Audubon Society Board)
Buena Vista Audubon Society