



Buena Vista Audubon Society
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June 21, 2021

Mr. Richard Greenbauer, Principal Planner
Planning Division, Development Services Department
300 North Coast Highway
Oceanside, CA 92054

Sent by email: rgreenbauer@oceansideca.org

SUBJECT: Comments on Scoping for Cypress Point Development EIR

Dear Mr. Greenbauer:

I am submitting the following comments on behalf of the Buena Vista Audubon Society with regard to issues to be analyzed in the EIR for the proposed Cypress Point project. We are an organization supported by 1,400 member households in north coastal San Diego County. We operate a nature center and conduct related activities in the City of Oceanside. The proposed development of 54 residential units is located adjacent to the San Luis Rey River, at the end of Pala Road and west of Los Arbolitos Boulevard. The property was sold as surplus land by the City of Oceanside.

The project has potential significant impacts on biological resources because of its location adjoining the San Luis Rey River, a major riparian corridor with a wide range of native wildlife and sensitive species. Of even greater importance is that this stretch of the river contains a concentration of community and government efforts, and the expenditure of resources, for wildlife habitat conservation. The following are in the immediate vicinity: the Whalen Lake Bird Sanctuary, Army Corps wetlands mitigation site, City-owned land with potential as a biological mitigation bank, and the Andy Mauro Nature Preserve. The Mauro Preserve, a 31-acre California Gnatcatcher restoration site, owned and managed by the Buena Vista Audubon Society, is now undergoing restoration activities funded by the Navy under their REPA (Readiness and Environmental Protection Integration) Program. Therefore, it is essential that any development approved in this area be designed in a way that does not diminish all these efforts for biological resource conservation on a major wildlife corridor.

Upon review of the Notice of Preparation and a visit to the site, we have the following recommendations for items to be included and/or analyzed in the EIR:

The EIR should contain a topographical map with clearly delineated: project footprint, 100-ft. biological buffer zone, river berm and bike trail, fire protection zone, site connections to protected and unprotected habitat and open space nearby, and the Draft Subarea Plan Hardline Preserve for sensitive species. The Hardline Preserve along the San Luis Rey River in the Draft Subarea Plan was designed to provide habitat for riparian wildlife. There is also a need to identify the current alignment and any re-alignment of the existing pedestrian trail along the river to avoid impacts on the riparian buffer.

Describe a habitat restoration plan and long term management plan for the buffer to support riparian wildlife and mitigate for development impacts.

Describe how will the habitat in the buffer be protected from indirect impacts of the development, such as lighting, noise, domestic animals, litter, recreational activities, off-road motorcycles and bicycles, etc.

For the required analyses of environmentally superior alternatives, please evaluate an alternative that alters the project design and an alternative that reduces the number of units in the development to determine a feasible alternative that reduces project impacts.

Thank you for including the above requests in the EIR to avoid, minimize and mitigate project impacts on biological resources.

Sincerely,

Joan Herskowitz
Conservation Committee
Buena Vista Audubon Society