



Wildlife and Habitat Conservation Coalition

--Dedicated to the sustained conservation of native animal and plant species in the Southwest Bioregion.

January 23, 2017

Mr. Mark Slovick, Planning Manager, Planning & Development Services
Mr. Greg Mattson, Project Manager, Planning & Development Services
County of San Diego

VIA EMAIL

RE: Conservation organizations comments on the Notice of Preparation for OTAY RANCH VILLAGE 14 AND PLANNING AREAS 16 & 19, PDS2016-GPA-16-008, PDS2016-SP-16-002, PDS2016-REZ-16-006, PDS2016-TM-5616, PDS2016-STP-16-027 and LOG NO. PDS2016-ER-16-19-006. (Village 14)

Dear Mr. Slovick,

The Wildlife and Habitat Conservation Coalition is dedicated to the protection and conservation of our regional wildlife resources. We are fully aware of the guidance and general allocation of open space and development outlined in the Otay Ranch GDP/Otay SRP and associated documents and MSCP and County's Subarea Plan. Also, we understand that subsequent planning for each village and planning area could involve changes to the original GDP, if concurred by the permittees and permitting agencies and consistent with subsequent public environmental reviews.

We have reviewed the NOP project description and the Initial Study identifying 18 issue areas of potential significant impact and, as a result, our Coalition is compelled to share our continued concerns regarding the Village 14 development, which encompasses Planning Areas 16 and 19.

Through this letter we suggest that the developers the County and the environmental community engage in a comprehensive approach to planning within this sensitive area and that collectively we work together to find the best solutions to achieve a healthy balance between development and conservation.

The Coalition and those it represents, are united in our objection to the project as currently designed and described. And as a general matter, we are not supportive of accommodating

growth in sensitive and irreplaceable wildlife habitat areas, in high risk fire areas, or in areas that will inevitably increase greenhouse gas emissions.

Although we are in opposition to the application as proposed, the Coalition looks forward to its continued dialogue with the County and developers to find adequate solutions that balance development with conservation and to help address the following concerns that remain unresolved.

- As proposed, the development footprint does not comply with the hardline agreement or the Baldwin Agreement within the MSCP Sub Area Plan. The proposal is therefore not consistent with the requirements or intent of the MSCP and its goals to ensure that high quality conservation is maximized while less important habitat areas are set aside for development.
- As proposed, the project will significantly impact golden eagle territory as established in Table 3-5 of the MSCP. The commitments made by the County and developers regarding mitigation and monitoring for raptors, including the golden eagle, have yet to be accomplished and the determinations by the Wildlife Agencies regarding the golden eagle territory associated with Village 14 and Planning Areas 16 and 19 and Table 3-5 remain unresolved.
- The proposed project poses a serious threat to the endangered quino checkerspot butterfly, particularly when viewed in conjunction with future identified development in the Village 13 area and reports of declining numbers in southern San Diego County, represents a significant impact that must be addressed.

The Wildlife Coalition understands the need for appropriate development, the need to house the population and the intent of this proposal. However, due to these significant, unresolved and outstanding issues, we are not in support of this project.

Through this letter we urge that the County take a different approach to the planning for Proctor Valley, Village 14 and Otay Ranch Village 13 project areas. A comprehensive approach to planning for development and conservation is needed. This requires that the developers of both projects (V14 and V13), the County and the environmental community work together to achieve a productive balance between development and conservation.

Such a sensitive and significant environment requires different tools and solutions to solve its complex conservation and development issues and achieve a and workable balance. The Coalition is requesting that the County discourage the continuation of a piecemealed approach to planning and development in this area. Alternatively, it is suggested that the County

establish an overall vision for this area that will enable solutions and outcomes for ecosystem planning and development planning to produce conservation and housing wins for both people and nature. Finally, we ask that the County work with us to find creative planning approaches to resolve the golden eagle, quino, vernal pool and other issues associated with this area.

At this time, we urge the development interests to reconsider this proposal and to **relocate** the units in an area far less destructive to the environment, where any such development is consistent with the MSCP and its species goals. We ask this so that the County can continue to meet the housing needs of the region and to enable the conservation actions necessary to maintain the biological value of San Diego's irreplaceable nature with all of its ecosystem services intact.

We know there are alternative options out there that will satisfy all interests. The Coalition looks forward to working with the County and the developers to find such solutions through the use of creative conservation and planning approaches.

Thank you for your consideration,

Undersigned Member Organizations of the Wildlife and Habitat Conservation Coalition

Joan Herskowitz, Buena Vista Audubon Society

Frank Landis, California Native Plant Society San Diego Chapter

Richard Halsey, California Chaparral Institute

Cara Lacey, The Nature Conservancy

Dan Silver, Endangered Habitats League

Pamela Heatherington, Environmental Center of San Diego

Laura Hunter, Escondido Neighbors United

Richard Fowler, Palomar Audubon Society

Diane Nygaard, Preserve Calavera

Jim Peugh, San Diego Audubon Society

Dr. Michael McCoy, Southwest Wetlands Interpretive Association

Van Collinsworth, Preserve Wild Santee

Renée Owens, President, Wild Zone Conservation League

Blair Crossman, Project Director, WildCoast

cc.

Mr. Mendel Stewart, US Fish and Wildlife Service

Mr. Ed Pert, California Department of Fish and Wildlife

Ms. Sarah Aghassi, Deputy Chief Administrative Officer, Land Use and Environmental Group, San Diego County

Mr. Mark Wardlaw, Director, Planning & Development, San Diego County

Mr. Brian Albright, Director, Parks and Recreation, San Diego County