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Planning and
Development Services

June 15, 2015

Dennis Campbell
Planning and Development Services
5520 Overland Ave Suite 310
San Diego, CA 92123

LATE

RE: Otay Ranch Village 13 – Draft Environmental Impact Report, General Plan Amendment and Specific Plan

Dear Mr. Campbell,

O-17-1 | On behalf of the Environmental Center of San Diego, thank you for the opportunity to comment on the above referenced Project. The Environmental Center of San Diego is dedicated to the protection and enhancement of the natural environment throughout the San Diego area.

O-17-2 | Let me begin by expressing our concern over the inadequate analysis of impacts presented in the Draft Environmental Impact Report. We support Endangered Habitat League's (EHL) comments, accompanying legal comments and biological comments, regarding the inadequacy of the DEIR regarding the endangered quino checkerspot butterfly (QCB) and the misrepresentation of wildlife corridors.

O-17-3 | Missing are acceptable mitigation measures for any of the Alternatives. Also missing is detailed analysis of cumulative impacts from developments, present or future that will contribute to fracturing the habitat that supports the quino checkerspot butterfly.

O-17-4 | We support the recommendation by EHL that "the County establish its own quino checkerspot butterfly review", in order for the biological science to meet the requirements of CEQA, in informing the public and decision-makers. A separate analysis must be made by experts, independent of any hired by the applicant.

O-17-5 | It has been previously demonstrated in other recent developments that the proposed Project will likely contribute to the destruction of the Otay Mountain core habitat of the QCB. As shown in the Murrieta Hogbacks developments in Riverside County, segmented habitat areas fail to support QCB populations. It is therefore important that an abundance of caution take precedence in preparing the EIR.

O-17-6 | Thank you for this opportunity to comment on this Project. Please keep us informed as to any processes involving Otay Ranch Village 13.

Sincerely,



Pamela Heatherington (805)835-1893
Board of Directors
Environmental Center of San Diego
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