



May 22, 2015

Mr. Dennis Campbell
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 110
San Diego, California 92123

Re: Otay Ranch Village 13 Master Planned Community Resort Village DEIR

Dear Mr. Campbell,

O-5-1 Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Otay Ranch Resort Village 13 Project. Please allow me to introduce myself. My name is Jonathan Appelbaum. I am writing to you today as a professional wildlife biologist, a member of the San Diego Audubon Society's Conservation Committee, and as a concerned citizen. I have reviewed the publicly available documents regarding the Otay Ranch Resort Village Project on the County's website and I wanted to provide you with a few comments about the proposed project, the ecological value of the lands proposed for development, and the project's inconsistency with State, Federal, and local resource protection objectives and planning goals.

O-5-2 First, the initial approval of the PEIR is ancient by current standards and seems horribly outdated. This project, approved in 1992, was authorized was prior to the listing of the Quino checkerspot butterfly (*Euphydryas editha quino*) - a Federally-listed native butterfly species, as well as prior to our present multi-year drought, and well before consideration of climate change and greenhouse gas emissions became a standard component of environmental review.

O-5-3 The Quino checkerspot issue is one of particular importance to me from a professional standpoint. I have formal training in the identification of the species and the USFWS survey protocols for the species (passed the exam, did not compete the hours in a greatly reduced flight season). I have also taken the San Diego County sensitive butterfly workshop multiple times and have worked alongside Quino experts including Dan Marschalek of SDSU and local lepidopterist Michael Klein of Klein - Edwards Professional Services. Based on my knowledge and understanding, the Otay Mesa and Proctor Valley populations of the species are critical in the context of the species metapopulation, and the current and historically occupied habitat within the Otay Ranch Resort Village 13 Project footprint and adjacent areas is critical for the dispersal of Quino and the species' long term viability. I feel that impacts to these populations of Quino checkerspot butterfly should be avoided at all cost.

O-5-4 Also of particular concern to me as a conservation biologist is the fact that the proposed Otay Ranch Resort Village development area includes mapped vernal pools on the K6 and K8 mesas. These vernal pools support the State and Federally-listed San Diego fairy shrimp (*Branchinecta sandiegoensis*). In my experience, impacts to fairy shrimp-occupied vernal pools are serious in nature and exceptionally difficult to adequately mitigate. In my opinion these resources, like the Quino populations described above, should be avoided altogether.

O-5-5

Another acknowledged impact of the proposed project would be direct impacts to 620 acres of foraging habitat for the golden eagle (*Aquila chrysaetos*). U.S. Geological Survey (USGS) surveys have identified that the proposed development area is used for foraging by at least one pair of golden eagles. Clearly impacts to foraging raptors is a organizational concern of the San Diego Audubon Society as well as myself professionally. More research is needed to accurately quantify the proposed projects likely impacts to the species. Furthermore, the *cumulative* loss of foraging habitat to golden eagle nesting pairs from development in this vicinity is substantial. Because of the uncertainty of the species continued utilization of the site following development, I believe that the DEIR's conclusion that impacts to golden eagles would be less than significant is not adequately substantiated.

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In addition to impacts to Quino checkerspot, San Diego fairy shrimp-occupied vernal pool habitats, and golden eagle foraging habitat, the proposed project would also have significant impacts to additional sensitive biological resources including serious impacts to western burrowing owl, coastal California gnatcatcher, numerous other State- and County-listed sensitive wildlife species, on- and off-site sensitive vegetation communities, jurisdictional waters, and important wildlife movement corridors. I feel that the adequacy of the proposed mitigation to address these impacts is questionable but of lesser significance than the Quino checkerspot, golden eagle, and occupied vernal pool habitats within the development area.

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Finally, as currently designed, the proposed project footprint adjoins the San Diego National Wildlife Refuge and is part of the only true coastal "core biological area" that is left south of Camp Pendleton. The proposed project site is also adjacent to or in close proximity to Proctor Valley and the City of San Diego's Otay Lakes Cornerstone Lands and their sensitive biological resources. Based on my experience working in the area, I believe that the cumulative impacts of the Otay Ranch Resort Village Project, project-associated "off-site road improvement", and other current, future, and reasonably foreseeable future projects on the San Diego National Wildlife Refuge and healthy habitats and listed species within Proctor Valley would be highly significant from a CEQA standpoint. I am also concerned with the project's contribution to urban sprawl and feel that this impact should be evaluated in greater detail than simply acknowledging the Project's inclusion in the 1993 Otay SRP.

O-5-8

Thank you for the opportunity to comment on the DEIR and please include me and the San Diego Audubon Society Conservation Committee on the distribution / circulation list for future notices related to the proposed project. Thanks again for your time and consideration.

Sincerely,



Jonathan Appelbaum
Biologist / Restoration Ecologist
San Diego Audubon Society Conservation Committee
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