



# Batiquitos Lagoon Foundation

*Preserve, Protect and Enhance*

October 14, 2006

Scott Vurbef  
Environmental Review Coordinator  
City of Encinitas, Planning and Building Department  
505 South Vulcan Avenue  
Encinitas, CA 92024

**Subject: Comments Concerning Notice of Preparation (NOP) of a Draft  
Environmental Impact Report for Batiquitos Bluffs, Case Number 05-157  
TM/DR/CDP/MUP**

Dear Mr. Vurbef:

The Batiquitos Lagoon Foundation (BLF) has been striving to *preserve, protect and enhance* the Batiquitos Lagoon Ecological Reserve and adjacent area since 1982 and appreciates the opportunity to become involved in the Draft Environmental Impact Report (EIR) process. While we wish we could preserve the Batiquitos Bluffs area in its current undeveloped state, we recognize the development rights granted by the City zoning ordinances and Master Plan. Given that development will occur in this area, we believe that the City's effort to develop a Draft EIR to ensure the protection of the environment to the maximum extent is critical.

The EIR process and associated study and analysis under California's Environmental Quality Act (CEQA) was enacted to put this process in place and to frame the key factors that must be considered when preparing one. The BLF, in its role as an environmental steward for Batiquitos Lagoon and associated watershed, becomes very concerned when any development project is proposed that has the potential to impact the very sensitive wetland, riparian, and coastal sage habitats near the lagoon. The projects close proximity to Encinitas Creek, one of three main water sources for Batiquitos Lagoon (San Marcos Creek and the Pacific Ocean being the other two) is a factor that absolutely must be carefully studied. While we appreciate that a significant amount of acreage will be devoted to open space, the project must incorporate environmental "Best Management Practices" throughout the design process and in any resulting plans. Items such as establishing proper buffers between the developed area and the Encinitas Creek drainage area are vital. Storm water runoff and erosion control must also be addressed. Since endangered or threatened bird species inhabit the area, study of the biological resources in the project area become extremely important. And since the area in and around the proposed project is one of the major sources for

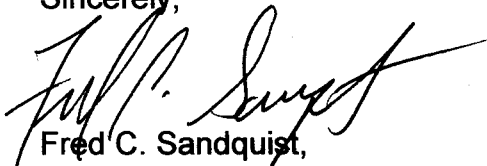
Pampas grass, a very prolific non-native invasive plant, we will be very interested in what measures will be imposed on the project to control invasive plants.

In reviewing your Notice of Draft EIR of September 15, 2006, we saw that it mentions some of the CEQA factors, but not all that should be considered when studying the Batiquitos Bluffs project. For example, factors such as aesthetics, land use and planning, population and housing, public services, recreation, and utilities and services systems were not indicated under "Potential Environmental Effects" in your notice. Even though their final impacts may be subsequently determined to be minor or not significant, we feel that they still must be properly addressed from the beginning. We also noted that "soils" was not included with "Geology". We feel that proper study of the soil within the project boundary is very important. "Traffic circulation" was included, but we consider the term "Transportation/Circulation" as a better category since it implies study from a broader perspective including access to and the effects the development might have on public transportation and regional transportation arteries. Since access to the project will be via a "right-in/right-out" road structure, we feel that the impacts that this might have La Costa Avenue and especially on the close proximity to the busy and complex intersection of La Costa Avenue and El Camino Real must be carefully analyzed. Since the speed limit on La Costa Avenue is currently 55 miles per hour, a properly designed deceleration lane becomes critical to public safety.

Another factor that we consider extremely important is the "Cumulative Impacts" this project might have when considering other development in the area along the El Camino Real and La Costa Avenue corridors. The impacts especially on water, sewer and storm water runoff must be very carefully analyzed. In addition, La Costa Glen is currently expanding their community, with construction already underway. What effect would adding the Batiquitos Bluffs project have on services like water, sewer, and emergency services (the right-in/right out traffic pattern and the fact that the nearest fire and rescue service is from the north above La Costa Resort and Spa)? We encourage the City to ensure that the EIR looks at all factors from the onset and makes recommendations based on this broader perspective.

We look forward to working with the City of Encinitas in crafting sensible solutions for Batiquitos Bluffs that will benefit both the city and the environment, and the opportunity to provide input during the EIR development process. Please add us to your list of interested parties and keep us informed as the project progresses.

Sincerely,



Fred C. Sandquist,  
President, Batiquitos Lagoon Foundation