



Batiquitos Lagoon Foundation

Preserve, Protect and Enhance

July 11, 2006

Christer Westman
Senior Planner
City of Carlsbad
1635 Faraday Avenue
Carlsbad, California 92008

**Subject: Ponto Beachfront Village Vision Plan Environmental Impact Report EIR
05-05 Scoping Meeting Comments**

Dear Mr. Westman:

The Batiquitos Lagoon Foundation (BLF) has been striving to *preserve, protect and enhance* the Batiquitos environs since 1983. While we wish we could preserve the Ponto area in its current semi-developed state, we recognize the development rights granted by the City zoning ordinance and Master Plan. Given that development will occur in this area, we believe that the City's effort to develop a vision plan and Environmental Impact Report (EIR) that provides a unifying theme for future development, while protecting the environment to the maximum extent are critical.

We firmly believe that there are environmental factors that must be considered in developing the Ponto Beachfront Village Area. The site's proximity to endangered species nesting grounds (e.g., the California Least Tern) requires setbacks and buffers, while the area's proximity to Batiquitos Lagoon and the Pacific Ocean require aggressive use of Best Management Practices for urban runoff, storm water and water quality management. Housing density, building heights, unobtrusive and low visual impact parking facilities, and pedestrian-friendly and properly landscaped and visually pleasing (e.g., park and mall-like landscaping) paths and walkways need to be carefully considered. The public's right of access to this area must be safeguarded by expansion and connection to the existing trail network. Prohibition of gated communities around the area is also considered important to maintain proper traffic flow. It is our understanding that a traffic study is just now being started. With traffic data beginning to be collected, we are concerned that the EIR contractor may not get realistic data since we are already well into July and the high tourist season. If data is not collected to update the traffic model now, rather than later, we feel the model may give invalid projections leading to significant future traffic congestion.

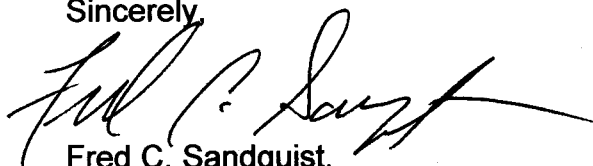
The BLF is particularly concerned about the proximity of a hotel and resort complex planned for the southeast corner of the project area. The proximity to the Least Tern

nesting area maintained by California's Department of Fish and Game is disturbing. We strongly recommend that if such a complex is built, that it be set well back from the bluff and not restrict access by the general public. Public access between the complex and the bluff with a landscaped trail should be required. This would also add more buffering between the complex, the lagoon and adjacent wetlands. A pedestrian bridge over the railroad tracks in this area, connecting the existing lagoon trail to the east would be highly desirable and enhance the public's experience when they visit the area.

Finally, we strongly recommend that the EIR, as required by CEQA, address other development projects to the north and south of the Ponto site. Since all of these projects interact and will have consequential impacts, the EIR must be inclusive. CEQA mandates this consideration in the EIR. The BLF strongly recommends careful study and consideration of these cumulative impacts during preparation of the EIR, and looks forward to reviewing the reported conclusions.

We continue to encourage the city to pursue its usual aggressive enforcement of county, state and federal statutes that protect our environment, especially our wetlands and endangered species. We look forward to working with the City in crafting sensitive solutions for Ponto Beachfront Village that will benefit both our City and the environment, and the opportunity to provide input during the EIR development process.

Sincerely,



Fred C. Sandquist,
President, Batiquitos Lagoon Foundation