September 10, 2002

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RE: Request to hold projects in abeyance inside Multiple Habitat Conservation Program Biological Core and Linkage Area

The purpose of this letter is to request that cities participating in the Multiple Habitat Conservation Program (MHCP) and the U.S. Fish and Wildlife Service hold in abeyance any approvals/processing of development projects impacting the Biological Core and Linkage Area pending finalization of the program.
On April 29, 2002, a coalition of environmental organizations sent you a letter commenting on the draft EIS/EIR for the MHCP. In that letter, we urged participating cities and the Fish and Wildlife Service to adopt the Biological Core and Linkage Area Alternative B Alternative No. 3, the biologically preferred preserve alternative. This alternative would conserve 84% (25,031 acres) of the remaining valuable habitat in the MHCP study area, as compared to a 66% (19,871 acres) conservation level with Alternative No. 2, the preferred Project.

According to the draft EIS/EIR for the MHCP, page ES-10, the BCLA includes all of the highest quality remaining habitat areas, including the largest remaining blocks of habitat and critical linkages between them. The BCLA alternative is the biologically preferred preserve alternative because it identifies all large contiguous areas of habitat, all areas supporting major and critical species populations or habitat areas, and all important functional linkages and movement corridors between them. It also adds 338 acres of coastal sage scrub restoration in key locations within the preserve and requires the preserve to be managed and monitored in perpetuity. It also targets additional conservation of approximately 400 to 500 acres in the unincorporated area known as the gnatcatcher core.

Conserving what remains of the Biological Core and Linkage Area is crucial to achieving the biological goals of the MHCP, which are to maintain the range of natural biological communities and species native to the region, and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, thereby preventing local extirpation or species extinction.

According to the draft MHCP EIS/EIR, only 27% of the land in the MHCP study area is undeveloped and still supports natural vegetation communities. The rest has been developed, with residential, commercial and industrial uses, parks and golf courses, and agriculture. North San Diego County is part of a region that has more rare, threatened, and endangered species than any comparable land area in the continental United States. Many of these species are in danger of extinction because of the loss of habitat, fragmentation of habitat and clearing of native plants for development.

With the MHCP, we have a major opportunity to create a viable preserve to slow or halt species extinction. However, we cannot lose any more of the Biological Core and Linkage Area to development and still achieve this goal. For this reason, we are requesting that the participating MHCP cities and Fish and Wildlife Service not approve or process projects impacting the BCLA until satisfactory finalization of the program.

We would like to point out that much of the BCLA and other environmentally valuable lands have already been lost to development, during the time that the MHCP has been in preparation. Some examples of major developments in the BCLA that have been approved, are in progress, or have been completed include:
1. Villages of La Costa, Carlsbad B Approximately 1866 acres are being developed. Uses include residential, commercial, infrastructure and public facilities and services.

   The Ridge and Oaks sections of this development are in the MHCP core gnatcatcher area. The valuable habitat for the threatened gnatcatcher is being removed for development of residences, commercial units, infrastructure and public facilities and services.

   The Greens section of the Villages of La Costa is in the BCLA, with the exception of the golf course on the property. Figure 4.3-2 of the draft MHCP EIS/EIR shows that one of the most intense clusters of sensitive species (not including gnatcatcher locations) in the MHCP study area is found on the west side of this property.

2. San Elijo Hills, San Marcos B About 963 acres in the core gnatcatcher area are being developed. Uses include 3,398 dwelling units, about 40 acres of community services, and 13 acres of neighborhood commercial.

3. University Commons, San Marcos B Also in the core gnatcatcher area, this development will use about 180 acres for residential development and about 30 acres for industrial, infrastructure and other uses.

4. Rancho San Pasqual, Escondido B This development took a big chunk out of the BCLA: 296 acres were used for residential development; 149 acres were used for a golf course; total: 445 acres developed.

5. Calavera Hills Phase II, Carlsbad B 146.9 acres of sensitive upland habitat and 3.5 acres of wetlands will be impacted for the construction of 700 homes, a community facility site and roadway extensions. The site is in the BCLA.

6. Evergreen Nursery, Oceanside B A commercial nursery and associated retail shop and support buildings are being built on 20.5 acres of coastal sage scrub and over half an acre of wetlands. This site is in the BCLA and is part of the primary MHCP corridor through Oceanside.

   As the above examples illustrate, a large amount of the valuable habitat in the MHCP study area has been lost during the time that the MHCP has been under development. The projects listed above alone account for 3655.5 acres of BCLA habitat that has been or is being developed, and this is just a partial list.
We are concerned that, at the current rate of construction, so much of the habitat for endangered, threatened and other sensitive species will be removed that a viable MHCP Preserve for North San Diego County cannot be created and maintained. There are a significant number of construction projects in the BCLA that are in the development approval process at the present time, including the following. (Please note that, while we have tried to get up-to-date information on current projects, this list may not be completely current.)

OCEANSIDE:
Douglas Dr. Apts. (D-6-00)  Oceanic Enterprises (D-2-02)
Highland Estates          El Corazon (MP-1-01)
Rio View Estates (T-4-00)  Melrose Equestrian Property (T-5-01)
Old Grove Apts. (D-5-00)   Ernest A. Taylor Estates (T-2-01)
Panorama Ridge (T-6-00)    Jeffries Ranch (T-9-99)
Mesa Pacific (T-5-99)      Darwin Village (T-4-99)

CARLSBAD:
The Terraces at Sunny Creek (96-02)  Holly Springs (00-21)
Kelly Ranch (97-16)            Cantorini Ranch (00-18)
Calavera Hills - Village H (90-19)  Carlsbad Oaks North (97-13)
Calavera Hills - Phase II (01-04)  Bressi Ranch Master (00-06)
Calavera Hills - Village R (90-24)  Kirgis (02-06)
Carlsbad Raceway (98-10)        Fox-Miller (00-20)
Palomar Forum (99-06)           Cote D'Azur (90-06)
Cote D'Azur Laguna (90-12)

ESCONDIDO:
Montreaux                  Emerald Heights (Phase 3)
Bernardo Mountain
Valley View

SAN MARCOS:
San Marcos Highlands        Golf Course on Cerro de los Posas
Walnut Hills II (TSM 335)   Altman (TSM 417)
Hansen (TSM 418)            Nevada Yei (TSM 432)

We urge the MHCP cities and Fish and Wildlife Service not to approve any further destruction of habitat/linkage areas in the BCLA for development until a satisfactory MHCP is produced.
Specifically, we ask that approvals for all projects impacting the BCLA now under consideration by MHCP cities and Fish and Wildlife Service be either through section 7 consultations, individual HCPs, or any other means be held in abeyance pending a satisfactory final MHCP. Calling a halt to destruction of the BCLA at this time will demonstrate that the Agencies and Cities involved are truly committed to creating a viable preserve in North San Diego County. It will also prevent the foreclosure of the alternatives that must be considered in the creation of the MHCP preserve.

Thank you very much for your consideration of this request. Please contact Mary Clarke at (760) 510-9684 if you would like to discuss this request.

Sincerely,

Mary H. Clarke
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California Native Plant Society
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Center for Biological Diversity
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Sally Thomas
Friends of Daley Ranch

Evelyn Alemanni
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cc: Janet Fairbanks, SANDAG
Bob Copper, County of San Diego