

Communication from Public

Name: Debbie Kinsinger

Date Submitted: 06/30/2020 09:01 AM

Council File No: 20-0105-S1

Comments for Public Posting: GOOD MORNING HONORABLE NURY MARTINEZ AND COUNCIL. I'M DEBBIE KINSINGER, CONSULTING BIOLOGIST AND CEQA PLANNER FOR BLUE ARCH INVESTMENTS. SPEAKING ON AGENDA ITEM 1 I FIND NO FAULT WITH THE HABITAT ASSESSMENT CONDUCTED BY GLEN LUKOS ASSOCIATES; HOWEVER, IT IS A SNAP SHOT IN TIME. WE ARE HERE TO CORRECT AN ADMINISTRATIVE PROCESS THAT FELL SHORT IN THE PLANNING PHASE. TWO KNOWN ROOSTS IN THE AREA HAVE BEEN DEMOLISHED WITHIN THE LAST THREE YEARS. WHEN AN UNOCCUPIED ROOST IS LOST THAT IS AN INDIRECT IMPACT. IT ADDS TO THE SIGNIFICANT, CUMULATIVE IMPACTS FROM THE DESTROYED COLONIES. WE DON'T KNOW IF BATS OCCUPIED THE BAY STREET HABITAT DURING THE PLANNING PHASE, BECAUSE THE SITE WAS CLEANED UP FOR THE SOHO PARKING. BATS MAY HAVE ABANDONED THEIR ROOSTS AND GUANO JUST HOSED OFF THE PAVEMENT. THOSE COLONIES THAT WERE DEMOLISHED WERE INDIVIDUALLY SIGNIFICANT, BY DEFINITION, THAT EXCEEDED THE THRESHOLD FOR MANDATORY FINDINGS OF SIGNIFICANCE. AND THAT IT HAS HAPPENED TWICE IN THREE YEARS? POINTS TO A CHRONIC LACK OF ADMINISTRATIVE OVERSIGHT WHO KNOWS HOW MANY COLONIES HAVE BEEN TAKEN THAT WE DON'T EVEN KNOW ABOUT? WHEN AN AIR QUALITY BASIN IS IN EXCEEDENCE FOR CUMULATIVE IMPACTS, THE INCREMENTAL PROJECT IMPACTS ARE COVERED IN THE CUMULATIVE EFFECTS ANALYSIS. THIS EIR, FOR BAY STREET DOESN'T DISCUSS CUMULATIVE EFFECTS TO BATS AND THEIR HABITAT EVEN THOUGH THE APPLICANT'S OWN HABITAT ASSESSMENT AGREES THAT THE SITE IS POTENTIAL HABITAT. REVISE THE EIR TO DISCLOSE THE CUMULATIVE EFFECTS IN THE WAREHOUSE DISTRICT DISCUSS MANDATORY FINDINGS OF SIGNIFICANCE SUPPORT THE FINDING WITH CAVEAT THAT THE HABITAT ASSESSMENT WAS CONDUCTED AFTER-THE-FACT OF ON-SITE IMPACTS. SAY WHY THE

INCREMENTAL LOSS OF HABITAT IS LESS THAN SIGNIFICANT IN LIGHT OF THE WHOLE OF CUMULATIVE EFFECTS WHICH HAVE NEVER PREVIOUSLY BEEN DISCLOSED. HONORABLE COUNCIL MEMBERS WE AND I AM LOOKING TO YOU FOR LEADERSHIP TO HOLD PLANNING ACCOUNTABLE FOR PUBLIC DISCLOSURE OF CUMULATIVE IMPACTS AND CEQA COMPLIANCE. REQUIRE PLANNING TO IMPLEMENT HABITAT ASSESSMENTS FOR ALL PROJECTS AND HAVE THEM PEER-REVIEWED. IT IS BETTER TO CORRECT THIS LACK OF DISCLOSURE OF CUMULATIVE IMPACTS WITH A REVISION TO THE BAY STREET EIR NOW THAN TO HAVE IT COME UP AGAIN AND AGAIN WITH EVERY SINGLE PROJECT WITHIN DISTRICT 14.

GOOD MORNING HONORABLE NURY MARTINEZ AND COUNCIL. I'M DEBBIE KINSINGER,
CONSULTING BIOLOGIST AND CEQA PLANNER FOR BLUE ARCH INVESTMENTS. SPEAKING ON AGENDA ITEM 1

I FIND NO FAULT WITH THE HABITAT ASSESSMENT CONDUCTED BY GLEN LUKOS ASSOCIATES;
HOWEVER, IT IS A SNAP SHOT IN TIME.

WE ARE HERE TO CORRECT AN ADMINISTRATIVE PROCESS THAT FELL SHORT IN THE PLANNING PHASE.
TWO KNOWN ROOSTS IN THE AREA HAVE BEEN DEMOLISHED WITHIN THE LAST THREE YEARS.

WHEN AN UNOCCUPIED ROOST IS LOST
THAT IS AN INDIRECT IMPACT.
IT ADDS TO THE SIGNIFICANT, CUMULATIVE IMPACTS
FROM THE DESTROYED COLONIES.

WE DON'T KNOW IF BATS OCCUPIED THE BAY STREET HABITAT DURING THE PLANNING PHASE,
BECAUSE THE SITE WAS CLEANED UP FOR THE SOHO PARKING.
BATS MAY HAVE ABANDONED THEIR ROOSTS AND GUANO JUST HOSED OFF THE PAVEMENT.

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THAT WERE DEMOLISHED
WERE INDIVIDUALLY SIGNIFICANT,
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AND THAT IT HAS HAPPENED TWICE IN THREE YEARS?
POINTS TO A CHRONIC LACK OF ADMINISTRATIVE OVERSIGHT
WHO KNOWS HOW MANY COLONIES HAVE BEEN TAKEN THAT WE
DON'T EVEN KNOW ABOUT?

WHEN AN AIR QUALITY BASIN IS IN EXCEEDENCE FOR CUMULATIVE IMPACTS,
THE INCREMENTAL PROJECT IMPACTS ARE COVERED IN THE CUMULATIVE EFFECTS ANALYSIS.
THIS EIR, FOR BAY STREET
DOESN'T DISCUSS CUMULATIVE EFFECTS TO BATS AND THEIR HABITAT
EVEN THOUGH THE APPLICANT'S OWN HABITAT ASSESSMENT
AGREES THAT THE SITE IS POTENTIAL HABITAT.

REVISE THE EIR TO DISCLOSE THE CUMULATIVE EFFECTS IN THE WAREHOUSE DISTRICT
DISCUSS MANDATORY FINDINGS OF SIGNIFICANCE
SUPPORT THE FINDING WITH CAVEAT THAT THE HABITAT ASSESSMENT WAS CONDUCTED
AFTER-THE-FACT OF ON-SITE IMPACTS.

SAY WHY THE INCREMENTAL LOSS OF HABITAT
IS LESS THAN SIGNIFICANT
IN LIGHT OF THE WHOLE OF CUMULATIVE EFFECTS
WHICH HAVE **NEVER PREVIOUSLY** BEEN DISCLOSED.

HONORABLE COUNCIL MEMBERS WE AND I AM LOOKING TO YOU FOR LEADERSHIP TO HOLD PLANNING
ACCOUNTABLE FOR PUBLIC DISCLOSURE OF CUMULATIVE IMPACTS AND CEQA COMPLIANCE. REQUIRE PLANNING
TO IMPLEMENT HABITAT ASSESSMENTS FOR ALL PROJECTS AND HAVE THEM PEER-REVIEWED.

IT IS BETTER TO CORRECT THIS LACK OF DISCLOSURE OF CUMULATIVE IMPACTS WITH A REVISION TO THE BAY STREET EIR NOW THAN TO HAVE IT COME UP AGAIN AND AGAIN WITH EVERY SINGLE PROJECT WITHIN DISTRICT 14.

Communication from Public

Name: Cynthia Myers

Date Submitted: 06/30/2020 09:33 AM

Council File No: 20-0105-S1

Comments for Public Posting: There are many southern California bat species that use urban and suburban environments at different times of the year. I do volunteer bat rehabilitation with the San Diego Humane Society and we have gotten many bats rescued from urban and suburban areas, even from downtown San Diego, including the following species: Yuma myotis, Mexican free-tailed bat, big brown bat, hoary bat, western yellow bat, big free-tailed bat, western mastiff bat, and canyon bat. These bats use urban and suburban areas at different times of the year when migrating through or as summer maternity sites. Many bats use older structures as maternity sites, and there have been several incidents of injured bats or orphaned pups rescued from roofing massacres, as well as from unscrupulous and inhumane pest control evictions during baby season. Just a single inhumane exclusion or eviction can destroy multiple generations of reproductively-successful females at one time in that one location, since most females form maternity groups when they come together to give birth to their single pup each year. Given bats' very slow reproductive rate, these mass mortality events can have a devastating cumulative effect on declining southern California bat populations over the years. Please consider the beneficial role of bats in our local environments, and the impacts on our bat populations, when you consider this project and others in the future. Surveys should be done in advance by qualified bat biologists to determine if bats are using the structures during migration, hibernation, maternity season, or are using nearby habitat as foraging sites. Thank you.