

Aug. 8, 2008,

Department of Planning and Land Use  
5201 Ruffin Road, Suite B  
San Diego, CA 92123-1666

RE: Comments on Draft Environmental Impact Report  
SPA 02-002, TM 5299RPL6, PO2-023, LOG NO. 02-19-021, SCH NO.  
2004081079; HIGHLANDS RANCH

FROM: Lookout Mountain Advocates (LOMA)

Please consider these supplemental comments on the Highlands Ranch Environmental Impact Report (EIR). We are aware of and agree with environmental concerns raised recently by biologists from the United States Fish and Wildlife Service (USFWS). The following significant concerns should be considered in evaluating the impact of the proposed project on the sensitive and bio-diverse ecosystems known to exist on Dictionary Hill:

1. As a result of the highly destructive fires in the San Diego National Wildlife Refuge and other natural areas of the county, this project's proposed environmental mitigation is very likely to be inaccurate due to the loss of high quality and very high quality habitat for the same species found on Dictionary Hill.
2. Mitigation for the *Dudleya variegata* and *Salvia Munzii* and other sensitive species is not addressed in the EIR. Although habitat for mitigation may exist, there has been no regional assessment.
3. Due to the loss of sensitive habitat in the fires, the value of the environmentally sensitive areas on Dictionary Hill has increased. This has not been evaluated.
4. During the fires, Dictionary Hill served as a refuge for a variety of species, including birds like the California Gnatcatcher and the Coastal Cactus Wren. Since this project site also includes significant areas of intact and unburned coastal sage scrub (CSS), perhaps the County should consider the feasibility of preserving Dictionary Hill as a mitigation site for proposed developments in less biologically sensitive areas.

Respectfully submitted,

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