



January 8, 2025

Mayor Bruce Delgado
City of Marina
211 Hillcrest Avenue
Marina, CA 93933

RE: Draft Environmental Impact Report (EIR) for the GP2045 (Item 4, Special Meeting Agenda)

Dear Mayor and City Council Members:

LandWatch submits this letter to request that the Marina City Council pause the process provided for under Item 4 on the Special Meeting Agenda, in order to consider new information about impacts to natural resources.

The current Existing Conditions report is inadequate in that it fails to identify the full extent of the impact of the proposed development on existing natural resources and protected species. Specifically, it misses almost all occurrences of sand gilia, a legally protected species (see map 1, attached). Based on maps of sand gilia and maritime chaparral recently provided to LandWatch (see maps 1 and 2, attached), there are serious concerns with respect to the overall balance between development acreage and avoidance of protected species.

Additionally, the current proposal could pose serious issues under CEQA. The City would benefit from addressing such concerns in advance, rather than proceeding with a flawed plan prone to challenge. Apparently, the City neglected to convene conservation or habitat groups to discuss the proposed impacts, despite having convened other Target Groups.

LandWatch therefore requests that the City Council not proceed with staff's recommendation. We ask instead that the City Council supports a pause in the process to consider natural resource impacts, to convene a habitat and conservation Target Group for input, and to craft an approach that will account for and protect vulnerable natural resources.

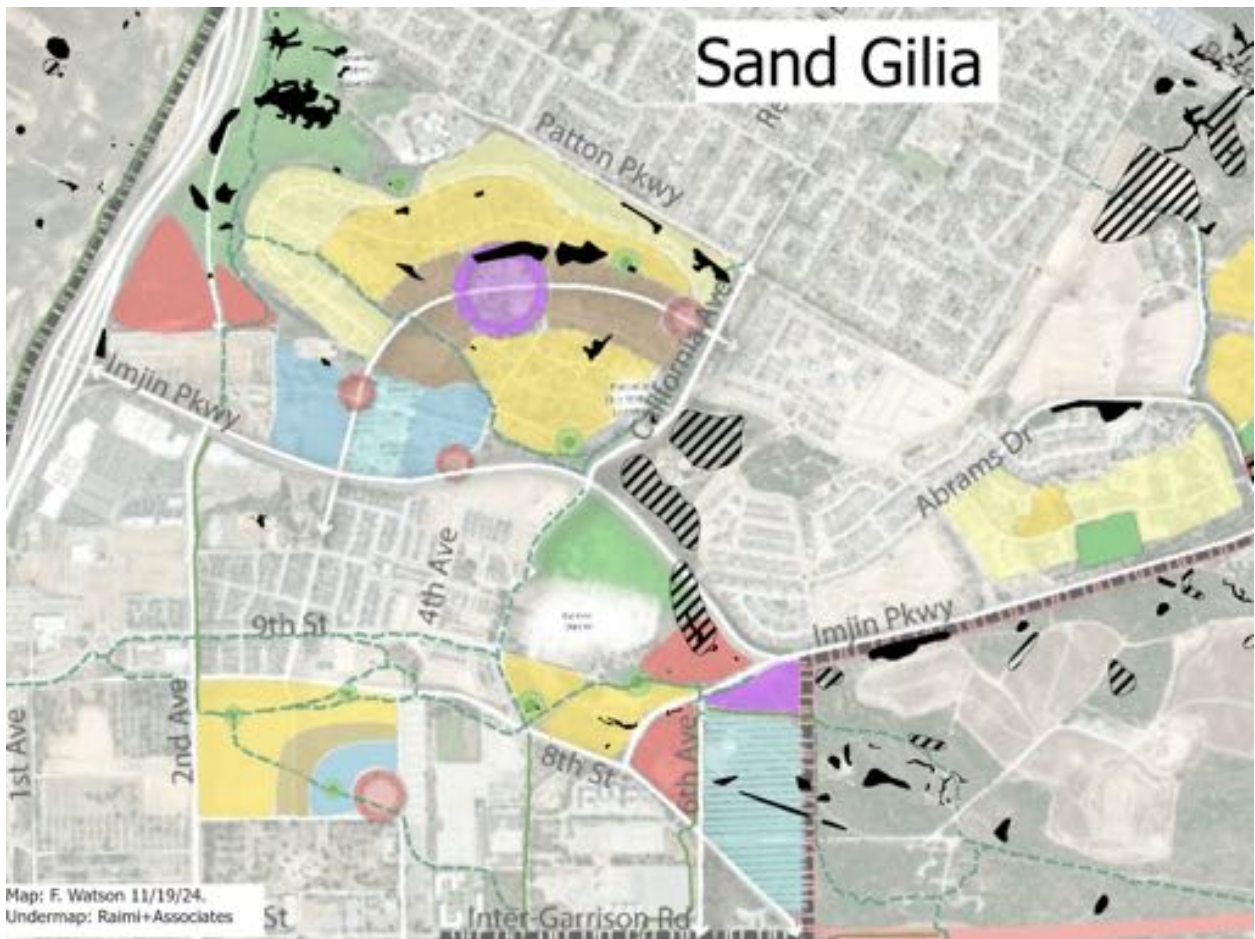
Thank you for your consideration and for the opportunity to comment. Please feel free to contact me should you have any questions.

Regards,



Michael DeLapa
Executive Director

Map 1



Map 2

