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## Letter/Commentary Title: Pond 20 - Imperial Beach Area - The Real Problem with "Mitigation"

Perfectly situated to benefit the economically depressed Palm Avenue Corridor, the 95 acre Pond 20 is the last remaining bayfront parcel of the 850 acre Western Salt works purchased by the Port District in 1998. After quickly giving 755 away to "mitigate" economic and public amenities to the North, such as Liberty Station, Pond 20 was "set aside for economic development" to benefit the IB Area.

On October 7th, the Port District, reversed their promise and posted a RPF (Request for Proposal) for "mitigation" of 84 acres of Pond 20. The bids are due November 4<sup>th</sup>. So the reader understands, "mitigation" is the process of setting aside land as undevelopable, in exchange for habitat destruction due to economic development somewhere else.

This is a devastating blow for the citizens of the IB Area. The Port District's own public outreach, and our comprehensive every door mail effort, indicate an overwhelming majority of the residents in the IB Area are either against Pond 20 being taken away by mitigation, or oblivious what is happening (most people do not know what "mitigation" means).

A lot of misinformation has been spread by the local nonprofits, Wildcoast and SWIA, who have self-serving motives for squashing any attempts for economic development of Pond 20. Their public outreach covers up the fact that only about 2% of Pond 20 is designated "wetlands", and the remaining has been deemed suitable for development. An analysis of "surveys" showing local support for their mitigation proposals will show that they are manipulative, misleading, and void of options.

The Wildcoast "Vision" for mitigation includes funding these projects through "grants" and "mitigation funds" from quasi-governmental agencies such as SANDAG and the Port Tenants (I suppose this is another way of saying taxes and fees that the citizens will eventually absorb). But what about the vast majority of the 755 acres already given to mitigation that has not been touched since the 1998 giveaway? Like the rest of the Palm Corridor, it has been left to languish, while the North has experienced unprecedented prosperity.

A real problem caused by the mitigation of Pond 20 is the positioning of the communities of the IB Area to future ongoing impoverishment and marginalization. We are being told by the nonprofits to put all our stock into "ecotourism" (which is more about profit from mitigation work for them), yet there is no rational economic model for the community to economically benefit. For example, Chula Vista's Living Coast Discovery Center, a top-notch ecotourism-related attraction, has continually been on the verge of closing due to losses.

Both Wildcoast and SWIA are coalition members of the "William Hall—Mitigation Stakeholders Team" mitigation proposal. In their argument for mitigation of Pond 20 they state "Funds that normally would provide return on investment (ROI) to commercial investors will be used for community benefit in Imperial Beach and south San Diego". What "funds", how much, and to whom? This is a big red flag. ROI and private enterprise are what the citizens of the IB Area need most.

In contrast, our homegrown proposal for Pond 20 includes a highly focused tourist attraction, The Pacific Coast Historical Dinner Show. With our hard fought rally cry "keep the tourist here one more day", we estimate the cost for establishing this world class entertainment venue will be paid off in less than two years. The steady flow of customers to the Palm corridor, away from the beach, will bring economic vitality to the currently depressed core of our city. This development is designed to accommodate foreseen sea level rise and coexist with the natural environment.

The giving away of Pond 20 for mitigating rich developments to the North is creating a great disparity of wealth. The divvying up of the public assets to an elite few is starting to look like a scene from Dr. Zhivago, the movie about the peak of Czarist Russia. The elitists are throwing their wine and cheese parties, while the local citizen's wants and needs are ignored.

The use of Pond 20 for mitigation is a punishment to an underrepresented and guileless people for giving proportionately more for the cause of bird habitat restoration. For the citizens of the IB Area, this is more than a paradox, it is an undermining of the fabric of democracy.

Roger Benham is author of the book "Downtown IB and other Fundamental Needs of the IB Area", published in 2014, and the webpage <a href="www.Pond20forUs.com">www.Pond20forUs.com</a> dedicated to saving Pond 20 for the promised economic development.