

I-292 Pam Nelson

Comment Letter I-292

**From:** Pam Nelson <pamela05n@yahoo.com>  
**Sent:** Monday, August 14, 2017 1:14 PM  
**To:** Smith, Ashley  
**Subject:** Newland Sierra -public comment-PDS2015-er-15-08-001

I support the submittals by the Endangered Habitats League, Sierra Club, California Native Plant Society, San Diego Chapter, and the Golden Door and incorporate their comments by reference

I-292-1

**This DEIR analysis should be withdrawn, significantly revised to correct the fatal flaws, and re-circulated prior to any certification.**

I-292-2

These are the fundamental flaws which undermine the entire DEIR and mitigation plan:

- A. DEIR analysis grossly misrepresents the content and impacts of the Existing General Plan alternative.
- B. The DEIR does not recommend the most environmentally appropriate alternative.
- C. DEIR fails to include all 'reasonably foreseeable' projects in the cumulative impacts analysis.
- D. DEIR and project consideration is premature and violates the conditions required under the Planning Agreement with the natural resources agencies, and is not consistent with the draft NCMSCP.
- E. There are several impacts to wildlife that are not acknowledged or mitigated such as connectivity and significant edge effects.
- F. Reliance on a gnatcatcher habitat mitigation site location over 20 miles away that has no gnatcatchers is unacceptable and inappropriate as mitigation for these habitat losses.
- G. DEIR attempts to 'piecemeal' the analysis by failing to include the interchange and roadway improvements in this analysis.
- H. Proposed project puts multi-family homes and a school in a known unhealthful location near a freeway putting peoples' health at risk. This is bad planning **and** immoral.
- I. DEIR fails to include required blasting plan.
- J. Requisite findings for a Habitat Loss Permit cannot be made. The project should be re-designed so that the necessary findings can be made if a Habitat Loss permit is to be issued.

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This proposed development, as all of those North of Escondido along the I-15, are adding to increased emissions due to the resulting traffic impacts especially during rush hour periods. How have GHG emissions been addressed?

I-292-13

I'm particularly interested in the fragmentation of Southern California habitat. Wildlife is finding less open areas to travel and finally cross the I-15. From Escondido north, wildlife need crossings for their east/west travel to keep their genetic diversity intact and find open space in our public lands to survive.

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Any proposed development along the I-15 must contribute mitigation funding for wildlife crossing plans, engineering and implementation. Funds could go to Caltrans, non-profits or a county agency earmarked accounts.

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## Comment Letters

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I am partnering (as a Sierra Club member in SW Riverside County) with a wildlife crossing team. We are developing strategies to understand how to resolve this critical issue.

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| Cont.

Thank you,

Pam Nelson

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