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.

This DEIR analysis should be withdrawn, significantly revised to correct the fatal flaws, and re-circulated prior to any certification.

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 NCMSOP.
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.

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’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 easterly travel to keep their genetic diversity intact and find open space in our public lands to survive.

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.
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.

Thank you,

Pam Nelson

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