

I-4 Lisa Amantea (2)

Comment Letter I-4

From: Lisa Amantea <laa42@cox.net>
Sent: Sunday, August 13, 2017 4:55 PM
To: Smith, Ashley
Cc: Jacob, Dianne; Cox, Greg; Gaspar, Kristin; Roberts, Ron; Horn, Bill; Wilson, Adam; Avina, Victor; Paguio, Jason; Granda, Adrian; Gretler, Darren M; jdesmond@san-marcos.net; esanchez@ci.oceanside.ca.us; melanie.wilson@sdcounty.ca.gov; Edrozo, Marisol
Subject: Newland Sierra DEIR

Dear Ms. Smith

The Newland Sierra development is located in what has been determined to be critical habitat by the 2011 GP. It is a large, intact, area essential for plant and wildlife sustainability. Newland Sierra would cause significant loss to critical biological habitat including, but not limited to native plant species and wildlife preservation and connectivity. This project seeks to alter what the public and county spent 10 years developing as a way to protect one the few remaining critical open spaces west of the I15. It goes against not only what the community wants, but *also* what the county determined would preserve our native and treasured species.

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I read in the summary section of the DEIR (S.0.3) that "due to the dense nature of the chaparral covering most of the project, wildlife movement is generally confined to existing dirt roads." Is it a reasonable conclusion that wildlife confines themselves to dirt roads when their very survival depends on surrounding plants, trees, bushes, grasses as a food source, shelter, protection, etc? By what analysis does the DEIR draw this conclusion and where is it found?

I-4-2

The California gnatcatcher has been documented in the proposed development. Proposals to mitigate what would be significant loss of this protected species by purchasing dissimilar land in Ramona does not appear to be a valid "swap." Ramona is too far away, too biologically different, and is not at the same elevation necessary for the California gnatcatcher to thrive. Furthermore the California Gnatcatcher has not been documented on the Ramona property. Where is this addressed in the DEIR? In regards to this property being used to mitigate wildlife connectivity, how does the DEIR explain land in Ramona mitigating the significant loss of connectivity generated by Newland Sierra's proposal to cut off large corridors in both the N-S and E-W directions of the Merriam Mountains and the San Marcos Mountain habitats?

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Regarding wildlife movement in the proposed area. I understand that the development will use ridge tops and fill in river bottoms, but denies any significant impact to wildlife as they will use the mid slope to travel. Is there evidence that this is the case? My understanding is animals shy away from the steep slopes that Merriam Mountains comprise, to use more easily traversed ridge lines and river bottoms. Is this addressed and analyzed in the DEIR?

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The community and the county spent over 10 years coming up with the 2011 GP. Compromises were made by all to strive to meet standards of smart growth. People spent their time expecting this plan to have some "teeth" to it, to be relied upon to protect the interests of all parties. The Newland Sierra project seeks to amend that plan by stating that this development poses no significant impacts. Granting this request is in *direct contradiction* to what the community and county officials determined was a *good plan, a smart growth plan* for San Diego County. Additionally, this development is situated right in the Pre-Approved Mitigation Area of the North County Multiple Species Conservation Program. Is this in essence building in what is already considered mitigated land? The county essentially denied this project twice when it sought approval under different

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names. It doesn't seem right that it is allowed to keep coming back and take up peoples' time and tax dollars for the county to evaluate over and over. How does Newland Sierra *not fit* the criteria for leap frog development? By allowing a development of this magnitude, essentially ignoring the 2011 GP, PAMA and NCMSCP, what protection is left against other such developments? If the 2011 GP/PAMA/NCMSCP have no "teeth," what does?

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In addition to above concerns and those outlined in previous emails (fire safety, traffic, blasting, noise/air pollution). I respectfully ask that this project and its request for a 2011 GP amendment be denied.

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Thank you for your time and attention to this matter,

Sincerely,

Lisa Amantea
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