

OLD WCCA LETTER

Agenda Item VII
WCCA
1/31/13

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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September 27, 2007

Mr. Alan Lawson, AICP, Senior Planner
City of Brea
Development Services Department
1 Civic Center Circle
Brea, California 92821-5732

Recirculated Draft Environmental Impact Report No. 02-01 Canyon Crest Project

Dear Mr. Lawson:

The Wildlife Corridor Conservation Authority (WCCA) offers the following comments on the Recirculated Draft Environmental Impact Report No. 02-01 for the Canyon Crest Project (RDEIR). WCCA was created for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente-Chino Hills and the Cleveland National Forest in the Santa Ana Mountains. As discussed in WCCA's August 12, 2002 letter on the previous plan and previous DEIR (2002), the project site is of regional importance because it provides critical core wildlife habitat and it is a key location for wildlife movement between portions of the Puente-Chino Hills separated by Carbon Canyon Road. The site is bordered to the west by Chino Hills State Park.

Brief Overview of Impacts to Biological Resources

There would be impacts to 216 acres of plant communities, including 34 acres of sensitive natural communities (RDEIR, pp. 4.4-31 and 32). Of these 34 acres, 17 acres are oak and walnut woodland communities, 14.2 acres are mixed coastal sage scrub, 1.5 acres are annual grassland/needlegrass grassland, and 1.4 acres are southern willow scrub riparian habitat. The proposed grading plan would result in the removal of 645 oaks and 1,147 walnut trees (RDEIR, p. 4.4-39). (The previous plan would have resulted in the removal of 671 coast live oak trees and 917 walnut trees [DEIR, 2002, p. 4.1-31].)

According to the RDEIR Executive Summary (pp. 15,19), unavoidable significant impacts to biological resource include the lost natural oak and walnut woodland values, and conflicts with Objective 20 and Policy 8 of the General Plan Conservation/Open Space Element.

Potential Environmental Impacts

The filling of large canyons at the southern portion of the project is counter opposite with the intent of working within the constraints of the existing landforms (see Exhibit 3-11). This is one of the largest proposed fill slopes that staff has seen in the wildlife corridor in over a decade.

The project will also result in fragmentation of core habitat and will result in the unnecessary removal of an extraordinary number of native trees including oaks and walnuts. WCCA continues to be concerned about the indirect impacts to biological resources including edge effects such as lighting, noise, presence of domestic pets (e.g., cats), creation of volunteer trails, etc. In addition, there is an inherent and unmitigatable pressure to manage (i.e., kill) wildlife when encounters between wildlife and people/pets increase. These edge effects can adversely affect wildlife movement through the proposed open space onsite, and can adversely affect the park resources of the adjacent Chino Hills State Park. Even with homeowner education materials (RDEIR, p. 4.4-42), based on the experience of our staff in managing parkland adjacent to residential areas, we can still expect there to be substantial edge effects on adjacent open space.

Although the RDEIR concluded that impacts to hydrology and water quality would be less than significant, WCCA is also concerned with the changes in quality and quantity of drainage from the project site. These can result from use of pesticides/herbicides, irrigation, increased impermeable surface, and hydrocarbons (e.g., oil from cars) in runoff. This new urban runoff associated with the project has the potential to adversely affect Carbon Creek. How does the project specifically mitigate these pollution influxes in the creek? Although the RDEIR (p. 4.8-13) mentions two detentions basins and refers to a Water Quality Management Plan to be approved by the City (p. 4.8-14), the Final Environmental Impact Report (FEIR) must provide more detail (e.g., type of equipment) regarding how pollution will be reduced prior to entering the creek.

WCCA continues to be concerned about impacts to aesthetic resources, and particularly impacts to views from park users in Chino Hills State Park (CHSP). As shown in the RDEIR (Exhibit 4.2-8 and Exhibit 4.2-9), views would be adversely impacted from park trails. The FEIR must address more viewpoints from CHSP, and in particular must assess along what approximate length of trails would views be adversely impacted.

The FEIR must address all of these adverse environmental impacts and propose avoidance and mitigation measures to address these impacts.

Need for a Constraints Analysis

As stated in WCCA's letters on the previous plan and DEIR (2002), the RDEIR is deficient in that it does not consider a constraints analysis, looking at ownerships, approved developments, development constraints, and topographic constraints for wildlife movement on adjacent properties. It is impossible to conclude that a functional wildlife corridor will be maintained through the site, when there is no consideration of what is happening to the surrounding and adjacent land.

Need to Consider Environmentally Superior Alternatives

There is a direct correlation between reducing the potentially significant environmental impacts and incrementally downsizing the project. WCCA continues to recommend that the California Environmental Quality Act process, the applicant, and City consider an alternative with a smaller footprint. Such an alternative is provided in this letter. WCCA strongly recommends that the project be modified, at the very least to avoid the need for a statement of overriding considerations.

The RDEIR is deficient to not justifying why the Environmentally Superior Alternative was not feasible. The RDEIR must only present this alternative if it is feasible. Apparently, an assessment of the economic feasibility was not done.

WCCA continues to recommend a slightly modified version of the Environmentally Superior Alternative (see attached figure). The large central drainage in the middle of the site should be completely avoided and a clear span bridge should be constructed over the creek. This would include deleting any units directly adjacent to the proposed road at the western edge of the site and placing culverts along the road at the southwestern portion to allow wildlife movement for small mammals. The RDEIR should analyze WCCA's proposed alternative and the difference in impacts (particularly to wildlife movement and to trees) between WCCA's proposed alternative and the current proposal. In WCCA's recommendation for a modified Environmentally Superior Alternative, WCCA recommends that a distinct cluster of southerly lots be deleted as shown the attached figure.

Preservation of Open Space

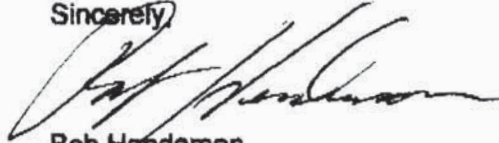
The RDEIR states that over 156 acres of the project site will be retained as natural open space. The FEIR must include in the project description and in the biological mitigation measures the dedication of the open space in fee to a park or conservation agency in perpetuity for permanent preservation. Alternately, but not preferably, open space easements could be required to be recorded over the proposed open space, in favor of a park or conservation agency and the City of Brea. It is not appropriate to dedicate this

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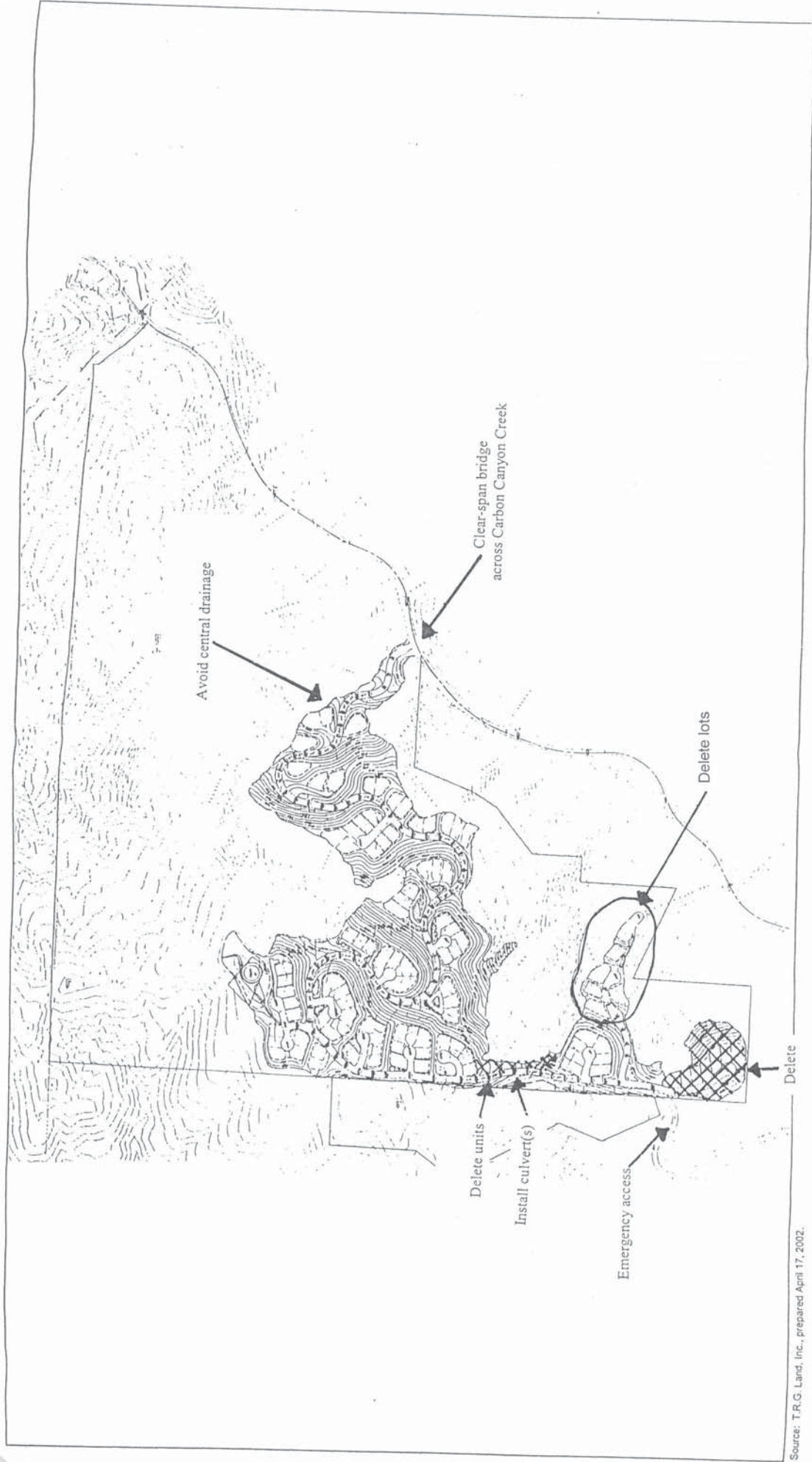
open space to a homeowners' association (HOA) as the goals of a HOA may be contrary to the goals of permanently preserving the biological resources onsite.

Thank you for your consideration. Please direct any correspondence and questions to Judi Tamasi at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Henderson", written in a cursive style.

Bob Henderson
Chairperson



Source: T.R.G. Land, Inc., prepared April 17, 2002.



See Wildlife Corridor
Conservation Authority (WCCA)
September 27, 2007 letter
for explanation.

Note: text and arrows shown in
exhibit are changes proposed
by WCCA.

MODIFIED

CANYON CREST
ENVIRONMENTAL IMPACT REPORT
Environmentally Superior Alternative

Exhibit 6.1-2