WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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May 23, 2014

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Notice of Intent to Prepare Draft Environmental Impact Report #619 for the Santa Ana River Parkway Extension Project

Dear Mr. Dickman:

The Wildlife Corridor Conservation Authority (WCCA) was created to provide for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. Thank you for the opportunity to comment on the Notice of Intent to Prepare Draft Environmental Impact Report (DEIR) #619 for the Santa Ana River Parkway Extension Project and Initial Study.

The proposed project is located at Coal Canyon, the last viable opportunity to maintain and enhance a critical ecological linkage between the Puente-Chino Hills and the Santa Ana Mountains (Noss, Beier, and Shaw). The Santa Ana Mountains and the Puente-Chino Hills contain biological resources of statewide and worldwide significance.

We support California State Parks' comments on this project. We are concerned regarding potential negative impacts to wildlife movement during construction and operation of the project due to the design of this project and its location in this ecologically sensitive area. We are also concerned with respect to any proposed hardening of the Santa Ana River and floodplain.

The EIR must include a map showing all property ownerships in the project area, as well as State Parks' property boundaries in relation to the project area. Any impacts to State Parks' resources must be clearly identified in the DEIR, and measures to avoid, minimize, and mitigate those impacts must be included.

The EIR must also clearly identify in figures and tables the acres of existing plant communities within the project area, and how many acres of each plant community will be temporarily impacted and permanently

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converted (including how much will be converted to impervious surfaces) by the project. It should include maps showing existing wildlife movement areas on and around the project site, with the canyons identified. The EIR must address what measures will be taken to ensure unimpeded wildlife movement through and around the project during construction and operation. Proposed fencing types and locations need to be clearly identified on a figure. In addition, the EIR must identify whether any night lighting will used during project construction and operation. In the EIR, avoidance of potentially significant impacts must be demonstrated. Also, there must be iron-clad mitigation measures to offset any significant adverse impacts to wildlife movement, native plant communities, and other biological resources. Any proposed habitat restoration or preservation must be clearly identified on maps with a firm commitment for management and protection in perpetuity.

Cumulative impacts to biological resources should also be discussed, including those impacts associated with other related or nearby projects, such as the Santa Ana River Trail Improvements Project, located just east of this project (proposed by Riverside County Transportation Department, Work Order #ZC10642).

We appreciate your consideration of these comments. Please maintain our agency on your email/mailing lists for this project. We look forward to reviewing the DEIR once it becomes available. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at judi.tamasi@mrca.ca.gov.

Sincerely,

Glenn Parker Chairperson

Reference

Reed Noss, Paul Beier, and William Shaw. Evaluation of the Coal Canyon Biological Corridor, Date unknown.