

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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January 21, 2014

Ron Tippetts
Planner, Current & Environmental Planning Section
Orange County Planning Services
300 North Flower Street
Santa Ana, California 92702-4048

Draft Environmental Impact Report for Cielo Vista Project

Dear Mr. Tippetts:

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. WCCA has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Cielo Vista Project and provides the following comments.

The conclusions regarding project-related and cumulative impacts to biological resources are not supported. The DEIR does not adequately avoid, minimize, and/or mitigate the potentially significant impacts related to loss of habitat occupied by the bird species, least Bell's vireo (*Vireo bellii pusillus*), considered threatened by the State and Federal governments; the loss of 14 acres of sensitive native plant communities (and loss of over 30 acres total of native plant communities); and the loss of habitat for other sensitive wildlife species. For example, deferring mitigation for impacts to the least Bell's vireo (i.e., obtaining other permits) is not adequate for the California Environmental Quality Act (CEQA). There should be an emphasis on avoidance of potentially significant impacts to biological resources.

The Esperanza Hills Project, adjacent to and east of the Cielo Vista Project, includes a proposal for 340 single-family residential units on 468.9 acres. Under both project options of the Esperanza Hills project, the street access and some grading would overlap with the Cielo Vista Project site. The design, grading, and construction of the two projects would need to be coordinated. The Cielo Vista and Esperanza Hills projects should be analyzed together due to their adjacency to, and dependency on, each other. That approach would align better with the intent of CEQA and Guidelines (e.g., section 15378). That approach would also allow for an up-front quantitative analysis of total impacts to biological resources. It would also provide a better mechanism for evaluating project modifications

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and alternatives in order to more effectively avoid and minimize environmental impacts for both projects combined.

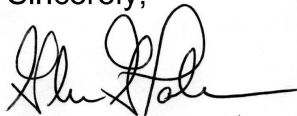
Although the Cielo Vista project proposes to preserve 36.3 acres as undeveloped open space, the DEIR does not adequately address the long-term protection and conservation of the open space. The Final Environmental Impact report (FEIR) and Conditions of Approval should address long-term protection of open space, for whichever alternative is ultimately approved. The FEIR mitigation measures and Conditions of Approval should specify that the remaining open space shall be protected in perpetuity through a fee title dedication and/or grant of a conservation easement(s) to a conservation and land management agency acceptable to the County of Orange and the California Department of Fish and Wildlife. An appropriate entity to accept this dedication could be California State Parks, WCCA, or the Mountains Recreation and Conservation Authority (dependent on said agency's concurrence at that time). The timing of the land transfer or recordation of the conservation easement should be specified (e.g., prior to the issuance of a grading or other permit, map recordation, vegetation removal, or issuance of a certificate of occupancy).

Adequate funding for long-term maintenance and/or management of the remaining open space (for whichever alternative is approved) should also be included as a mitigation measure in the FEIR mitigation measures and in the Conditions of Approval. The timing of the establishment of said funding should also be specified. For example, this condition could require placing the funding in an escrow account, or finalizing a Landscape Maintenance District, prior to the issuance of a grading or other permit, map recordation, vegetation removal, or issuance of a certificate of occupancy. These conditions would provide the necessary assurances for preserving the sensitive plant communities and wildlife species in the remaining open space.

The argument against implementing the less damaging alternative (Planning Area 1 Only) is not adequate. We recommend that the County adopt the Planning Area 1 Only Alternative. This alternative increases the amount of open space preservation to 42.7 acres. This alternative would substantially reduce impacts to sensitive plant communities and sensitive wildlife species (e.g., least Bell's vireo) found in Planning Area 2.

We appreciate your consideration of these comments. Please continue to maintain our agency on your email/ mailing list for this project. 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