

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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June 11, 2019

Kevin Shannon, Contract Planner
Orange County Development Services
300 N. Flower Street
Santa Ana, California 92702-4048

**Notice of Preparation Comments
Brea Boulevard/Brea Canyon Road Widening Project
SCH # 2017051005**

Dear Mr. Shannon:

The Wildlife Corridor Conservation Authority offers the following comments on the above referenced Notice of Preparation. The project would result in both permanent and temporary unavoidable significant adverse biological impacts because of disturbance to over a mile of habitat within and along Brea Creek. Brea Creek along the majority of the project length is well intergrated with the core habitat of the western Puente Hills.

Where Brea Creek crosses under the 57 Freeway is the only location where large mammals can cross under the freeway without having to actually make a surface crossing of Brea Canyon Road. Brea Creek is a regionally significant habitat linkage that connects the segments of the Puente Hills on either side of the freeway. The proposed project should be designed to maximize wildlife access to this freeway undercrossing. The Draft Environmental Impact Report (DEIR) must include an alternative that demonstrably maximizes the quality of habitat leading up to the freeway undercrossing. That alternative must maximize such efforts on all land controlled by the lead agency and any participating agencies. That alternative must permanently protect all remaining public road right of way along the project length as the only means of guaranteeing that further reduction in habitat linkage capacity cannot occur. Permanent protection is defined by granting a conservation easement to a non-County of Orange park or conservation agency.

The DEIR must analyze street lighting impacts on wildlife use of areas along the full length of the proposed project.

The DEIR must analyze the fact that Brea Creek is the most significant stream course in the Puente Hills core habitat area between the 57 Freeway and Harbor Boulevard. Is there any other stream course in the hill system between these two above mentioned transportation corridors, that provides even near equivalent of a wildlife water source or habitat for

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aquatic and amphibian wildlife? How would the proposed project affect wildlife access to the creek and affect the quality of habitat in the creek both from direct and indirect impacts? All of these impact questions must be further addressed in the context for the project-required multi-year dewatering of the creek.

All of the project alternatives will require extensive and expensive habitat mitigation. The NOP is deficient for not addressing the landownership and breadth of both the lead agency and project participants. It is imperative to know how much land can be permanently protected as project mitigation without requiring the purchase of additional mitigation lands. If insufficient mitigation lands are under the control of project entities it is imperative to require offsite habitat replacement to be fulfilled prior to project impacts occurring. It may be that a significant in lieu fee is paid to a conservation organization such that the purchase of mitigation land interests can be pursued immediately after the project approvals have passed the period of judicial review.

WCCA also suggests that the DEIR include an alternative that does not expand the width of the majority of the subject bridges but widens the other parts of the existing road to provide a central lane with double yellow striping. Such a central non-travel lane would increase safety and provide a temporary by-pass lane around stalled cars and accidents as well as facilitate the passage of emergency and wide load vehicles. Project cost and biological impacts would be significantly reduced. The existing body of evidence that the addition of lanes to add capacity will increase traffic volume such that the gains in traffic speeds are at best temporary is indisputable. Such increases in capacity exacerbate transportation, air quality, and natural land protection problems.

Sincerely,

Glenn Parker
Chairperson