# WILDLIFE CORRIDOR CONSERVATION AUTHORITY

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065
TELEPHONE: (310) 589-3230
FAX: (310) 589-2408


## MEMORANDUM

Date: November 19, 2008

To: The Governing Board Members

From: Joseph T. Edmiston, FAICP, ASLA (Hon), Executive Officer

Subject: **Agenda Item XII: Update and discussion regarding Canyon Crest Project, Tentative Tract Map No. 15956, City of Brea.**

Background: This is primarily an informational item. WCCA prepared several comment letters on this project, including one dated September 27, 2007 on the Recirculated Draft Environmental Impact Report (RDEIR) and an August 12, 2002 letter on the DEIR, and a July 5, 2000 letter on the Notice of Preparation. The following is an update provided by the City planner.

- The Planning Commission approved the project on June 24, 2008. The Commission's decision was appealed on July 2.
- Thus far, the City Council has held public hearings on September 16, October 7, October 21, October 29, and November 4 to consider the appeal.
- The continued public hearing at the Council meeting on November 18 will consist of more questions from the Council for City staff.
- Staff is recommending that the City Council uphold the Planning Commission's decision and deny the appeal request.
- The project has not changed from what was described in the RDEIR.
- The natural open space area amounts to 156.2 acres. It is City of Brea staff's understanding that the applicant has had ongoing discussions with the Center for Natural Lands Management. However, the Planning Commission added a condition specifying that the City has final approval of the entity proposed by the applicant to be land management caretaker of the 156 acres.

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CITY OF WHITTIER

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LOS ANGELES COUNTY
BOARD OF SUPERVISORS

September 27, 2007

RECEIVED
SEP 27 2007
PLANNING DIVISION

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. 1

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 domestics 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. 2

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. 3

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. 4

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. 5

**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. 6

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**

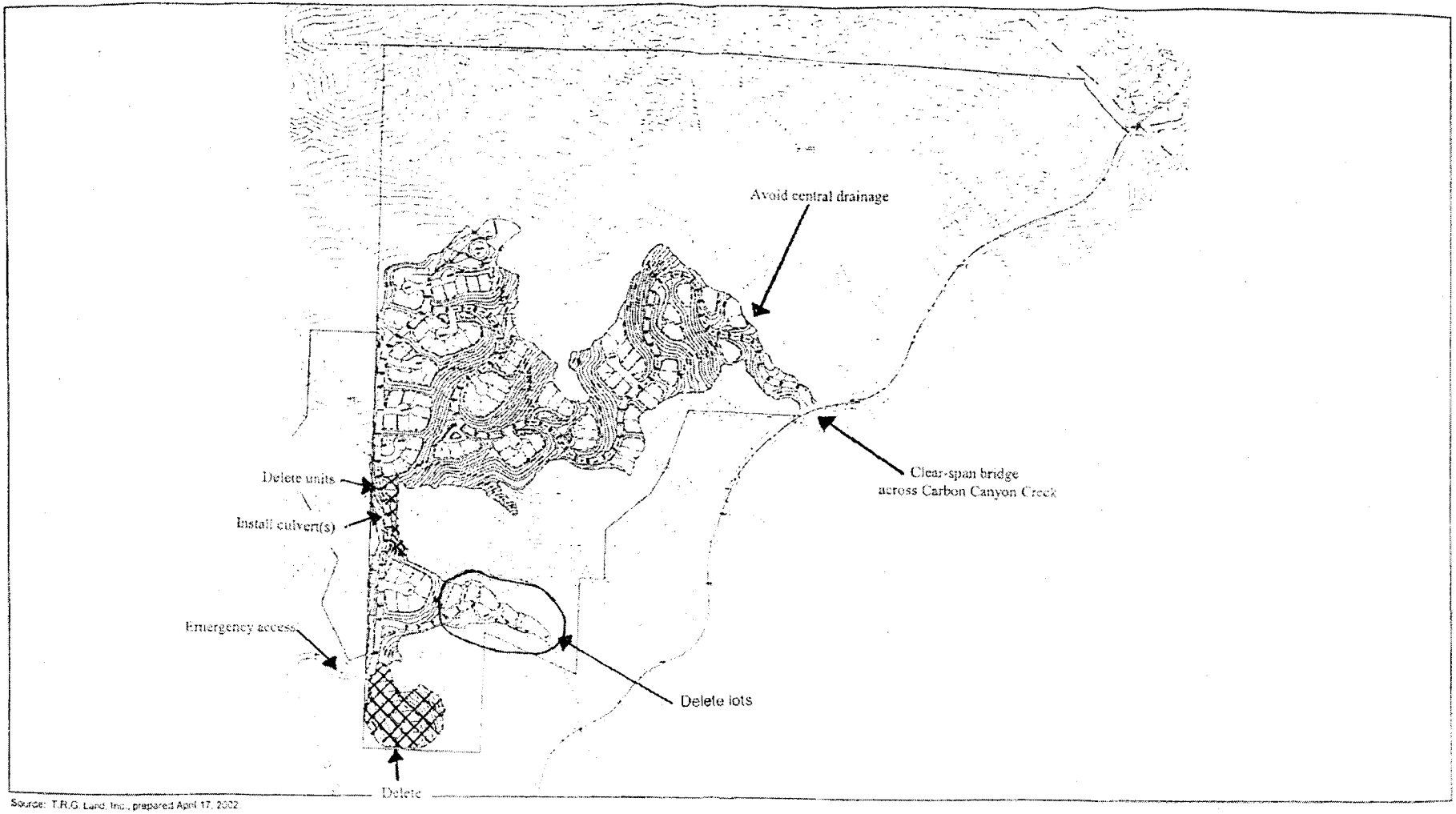
The RDEIR states that over 156 acres of the project site will be retained as natural open space. The FEIR must include in the project description and in the biological mitigation measures the dedication of the open space in fee to a park or conservation agency in perpetuity for permanent preservation. 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 7

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. 7

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,

Bob Henderson
Chairperson




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

Not to Scale

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**

**Response to Letter 34 - Wildlife Corridor Conservation Authority**
**September 27, 2007**

Comment 34-1: The concern regarding the large fill area is noted. Most of that area is within a landslide complex and the grading is largely remedial, to remove the landslide materials and replace it with engineered soils materials that will be landscaped. As discussed on pages 4.4-36, the edge of this manufactured slope is part of a 1,100-foot wide open space area to be preserved to facilitate wildlife movement across the site, to habitat in Sonome Canyon and Chino Hills State Park. As such, the wildlife movement corridor that exists in this area will be retained in the proposed plan. Mitigation measures 4.4.3d-1 to 4 provide additional guidance to ensure that the open space/wildlife corridors to be preserved are well designed and include appropriate features to provide a viable habitat linkage for wildlife and to protect both wildlife and project residents from potential conflicts.

Comment 34-2: Potential conflicts between future residents and wildlife are expected, given this setting, but the situations can vary greatly as can solutions. This issue is something that all future homeowners must consider when they purchase a lot and/or home. RDEIR Mitigation Measures 4.4.3f-1 and 2 require preparation and distribution of homeowner educational materials and selection of appropriate landscaping materials, to minimize potential adverse edge effects. The following refinements to these measures have been made, to provide further guidance in their implementation.

**MM 4.4.3f-1**: Homeowner educational materials shall be included in the CC&Rs, to inform future homeowners of the potential for adverse effects on the Shell/MWD HCP wildlife habitat, and identify best practices in landscaping, pet control, *pest control*, outdoor lighting control, and sensitivity to wildlife while hiking or biking in the nearby HCP/state parkland. *Signage will be used throughout the development adjacent to open space areas reminding residents of the native plant and wildlife habitats in their vicinity. To minimize adverse effects that could result from application of chemicals in the built landscape, all homeowners would be provided with guidelines and educational materials strongly encouraging very limited use of pesticides, rodenticides, and/or herbicides. These materials will also encourage homeowners to contract with professional pest control specialists to ensure that the application of these types of chemicals is necessary, will target the pest species, and is applied according to the product labels to minimize safety and environmental concerns. During permit processing with the Regional Water Quality Control Board (RWQCB) (i.e., NPDES or 401 Water Quality Certification), additional conditions may be imposed to restrict or prohibit use of certain chemicals to protect water quality.*

**MM 4.4.3f-2:** *To minimize the potential for invasive plant species to escape into open space areas adjacent to the project, the landscape plan for manufactured slopes and fuel modification zones along the outer perimeter of the development (i.e., that are adjacent to open space areas) shall incorporate the use of native plant species to the maximum extent practicable. The applicant will work with a professional landscape architect and/or habitat restoration specialist that specializes in native habitats and the appropriate species for these types of areas.[4] The plant palette shall be consistent with the Orange County Fire Authority Fuel Modification Plans and Maintenance Program (2004) and shall focus on native species provided in the Fuel Modification Zone Plant List that occur within the study area. Further, the plant palette shall avoid the use of exotic plant species known to be highly invasive. For reference, a list of 50 invasive exotic plants that should be avoided is included in Urban Edge Effects and their Relationship with the Natural Environment (California State Parks-Inland Empire District September 2000).[5]*

Comment 34-3: A range of water quality filtration mechanisms and maintenance practices will be specified in the WQMP, as outlined on pages 4.8-9 in the RDEIR. These include structural BMPs, i.e., the two-stage extended detention-water quality basins, along with erosion control measures, rip rap energy dissipators at storm drain outlets, use of "smart" irrigation controllers, and storm drain stenciling and signage. Non-structural BMPs will likely include: providing educational materials to future homeowners, landscape management and maintenance, BMP maintenance, common area litter control, common area catch basin inspection and maintenance, and street sweeping.

All of these kinds of water quality controls can be readily accommodated in this project design and would not require significant alterations in the grading, lot configuration, location of detention basins, or any other essential framework elements of this development plan. All of these kinds of control measures have been in practice for years and are known to be practical and effective. A detailed WQMP, suitable for permit issuance, is not required to demonstrate that the effects of site runoff can be sufficiently mitigated to protect the water quality of Carbon Canyon Creek.

Comment 34-4: The view locations presented in the RDEIR are the same as the locations analyzed in the previous Draft EIR No. 02-01. These locations were selected to provide a representative sampling of the appearance of the project site from a variety of vantage points within surrounding public open spaces, focusing on spots within Chino Hills State Park and along Carbon Canyon Road. Consideration of every trail location that has views of this site is not required and

[4] Orange County Fire Authority, Planning and Development Services Section, July 9, 2004. Fuel Modification Plan and Maintenance Program.

[5] Available online at hllp://www.parks.ca.gov/pages/21280/files/urbanedge.pdf.

is not necessary to adequately assess the visual impact of the project with respect to the visual character and quality of the site and surroundings. No further analysis of visual impacts from public trail locations is warranted.

Comment 34-5: A constraints analysis containing the elements suggested by this comment is not a requirement for an EIR, in the State CEQA Statutes or Guidelines or the City's local rules for implementing CEQA. Ownerships and land uses of surrounding properties are well known and these are identified in the RDEIR (see Exhibit 4.9-1). If proposals to change land use on private properties adjacent to the Canyon Crest site should occur, they will be subject to an assessment of environmental impacts, pursuant to the lead agency requirements under the California Environmental Quality Act. No such proposals are pending at this time; therefore it is speculative to predict the specifics of any such change in land use or its environmental effects.

Comment 34-6: Please refer to Master Response 5, which summarizes the results of an economic feasibility assessment of the Reduced Development Envelope/Fewer Homes Alternative that was identified in the RDEIR and in this comment as the "Environmentally Superior Alternative." That assessment determined that this alternative is financially infeasible, and therefore does not warrant further consideration. The modified version of this alternative suggested in this comment is highly similar in its layout and site development requirements, and would thus have the same financial implications. It is also, therefore, considered to be infeasible.

Comment 34-7: The Center for Natural Lands Management (CNLM) manages wildlife preserves throughout California. The Center is a multi-faceted organization whose primary purpose is the long-term stewardship or management of native species and their habitats. CNLM's primary purpose is to maintain open space for the benefit of native plants and animals. Its focus in attaining this goal is to enable natural processes to continue so that the complex interactions of all natural systems thrive with as little intentional manipulation as possible.

CNLM takes on the perceptual responsibilities to ensure that these lands and their plant and animal life are protected forever. The Center for Natural Lands Management was founded in 1990 and incorporated as a nonprofit tax exempt organization under section 501(c)(3) of the Internal Revenue Service to protect sensitive biological resources through professional, science based stewardship of mitigation and conservation lands in perpetuity. The Center is not an advocacy organization, and so does not lobby for or against projects.

The Center provides a unique service, facilitating the successful implementation of federal, state and local statutes designed to insure that our natural heritage is protected for future generations. The Center provides this service through:

- Being a knowledgeable resource and cooperator with land trusts, conservation organizations, public agencies, developers and other land

managers that require expertise in the management of environmentally sensitive lands.

- Accepting title to mitigation lands and conservation easements or stewardship contracts. However, merely setting lands aside and preventing development is not sufficient to preserve and protect biological integrity. These lands require informed, science-based management to insure that valued resources persist.

- Providing professional ecological management for sensitive natural areas, on lands we hold in fee title as well as through contracting our services on lands held by others. We identify the critical processes and elements that need protection, implement adaptive management practices and apply the most effective tools needed to meet our protection goals.

- Providing planning, budgeting and investment strategies to insure the financial resources are in place to sustain necessary stewardship activities. Critical land management activities are never one time efforts, rather they need to be implemented whenever risks to elements of biodiversity arise. Thus sufficient financial resources need to be available in perpetuity.

The Center is presently managing more than 50,000 acres of conservation lands throughout California. This includes 64 separate projects, ranging from 1 acre to 21,000 acres. Projects are found in desert and coastal sand dunes, desert palm oases, coastal sage scrub, vernal pools, marshland, grassland, and riparian forest habitats. Management at these very different spatial and ecological scales has required us to implement a broad range of tools to insure critical resources are protected. Those tools include: endangered species monitoring and enhancement, prescriptive burn programs, grazing, trespass control, invasive exotic species control, environmental education, passive public recreation, and interagency and research coordination.

CNLM's management activities have often required formation of effective partnerships with other lands owners and managers, including the U.S. Bureau of Land Management, U.S. Fish and Wildlife Service, California State Parks, California Department of Fish and Game, various County Parks, Public Utilities, California State Land Conservancies, The Nature Conservancy, as well as private land owners and land conservancies.

The Shopoff Group has been coordinating with the CNLM to determine if CNLM will maintain approximately 150 acres of open space within the Canyon Crest property in perpetuity. The Shopoff Group is currently working with CNLM on a Property Analysis Record (PAR). The PAR incorporates and projects the costs of essential management actions including surveying, monitoring and reporting (including required agency monitoring and reporting), and maintenance of physical and biological resources. Also included in these analyses are the costs for invasive exotic species control programs, fire management, educational and visitor service efforts and administrative expenses such as personnel, accounting,

legal, and insurance items. This analysis is based upon the assumption that the resources will be managed in perpetuity and factors in the risk of sporadic natural and induced events that affect habitat areas.

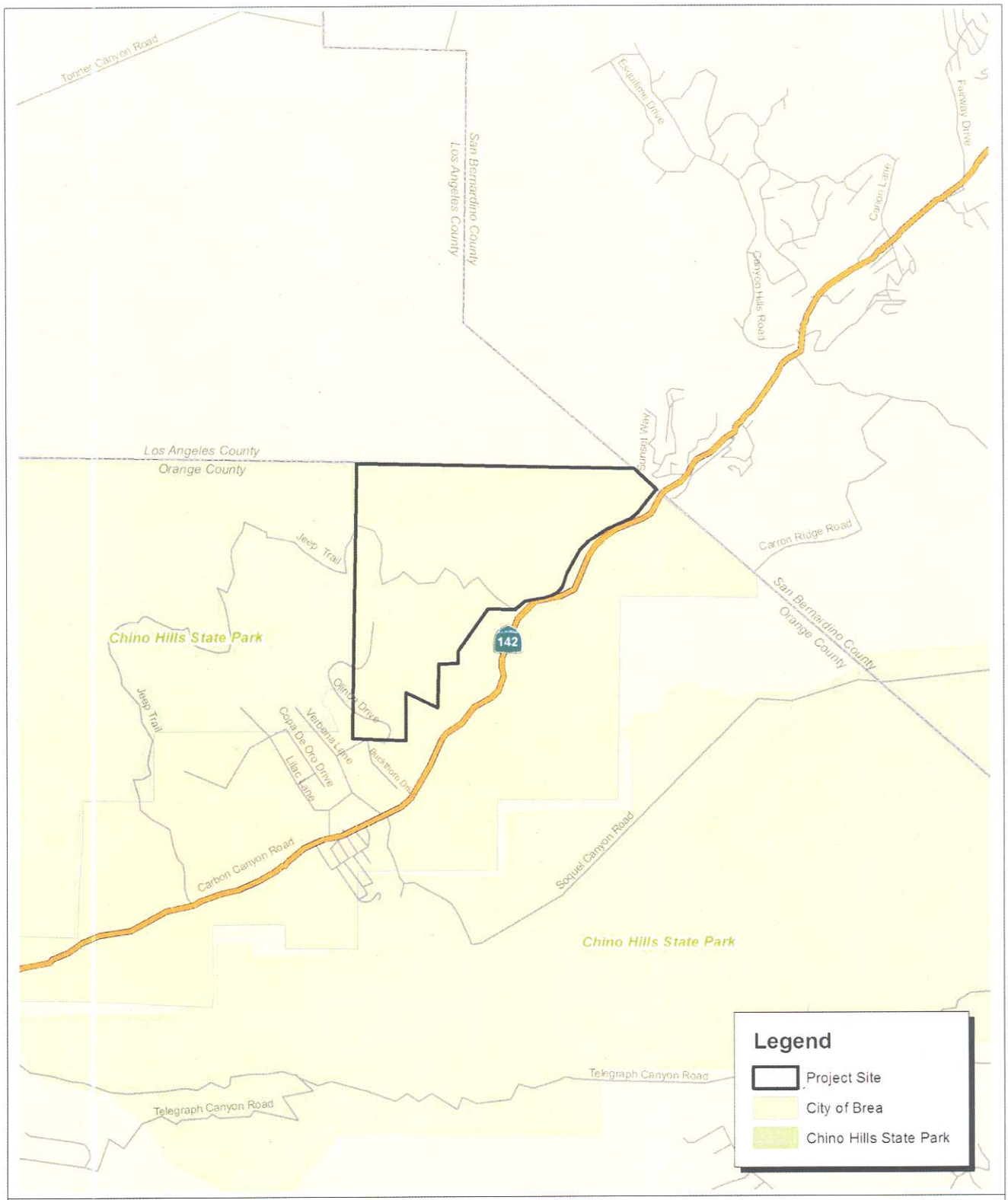
If agreed to by both CNLM and The Shopoff Group, the CNLM will be responsible for maintaining the 150 acres of natural open space within Lots 'AA' and 'II' as shown on VTTM 15956. The property is proposed to be deeded in fee title to the CNLM, but may also be maintained under a conservation easement. The preserved open space areas are separate from the developed areas and manufactured slope areas within the development footprint of the Canyon Crest Project. The Canyon Crest HOA would be responsible for maintaining the manufactured slopes, the private internal streets, and the land within the project that is not within the conservation easement.

## Master Response 5: Feasibility Assessment of Environmentally Superior Alternative

***Issue:*** Several comments submitted on the RDEIR recommended that the City select the Reduced Development Envelope/Fewer Homes Alternative instead of the proposed project, to reduce or avoid significant impacts involving grading, aesthetics, air quality, biological resources, traffic, and demand for public services and utilities. This alternative is described on page 6-3 to 6-4, illustrated on Exhibit 6-2, and assessed in comparison to the impacts of the proposed project on pages 6-11 thru 6-14 in the RDEIR. It is identified as the Environmentally Superior Alternative on page 6-17. The Reduced Envelopment Envelope/Fewer Homes Alternative was discussed in the original EIR 02-01 and was also identified as environmentally superior to the previous 216-lot development plan.

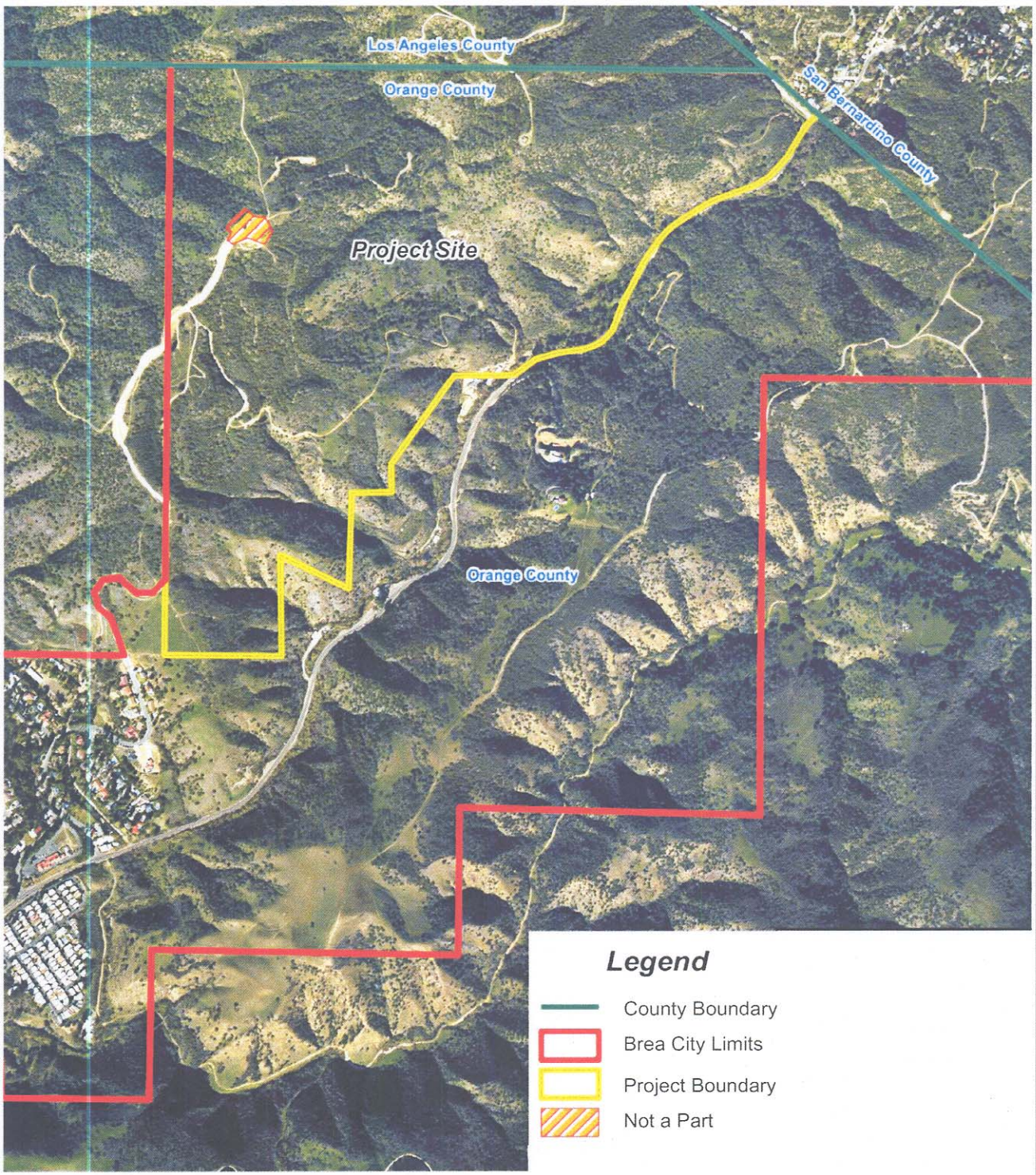
***Response***

The "Reduced Development Envelopment/Few Homes Alternative" alternative has been shown to be financially infeasible, based on an assessment of development costs and anticipated returns on investment. A copy of the full feasibility analysis will be incorporated into the Final EIR. As explained therein, costs to acquire, entitle and develop the land would exceed the estimated proceeds of sale of finished lots to home builders. As a privately financed project, a negative return on investment cannot be justified. Since this alternative is not financially feasible, it will not be considered as a viable alternative to the proposed project.




Source: Census Data and MBA GIS.

**Exhibit 3-2**
**Vicinity Map**




Source: Stantec, January 2006.

**Exhibit 3-3**
**Aerial View**

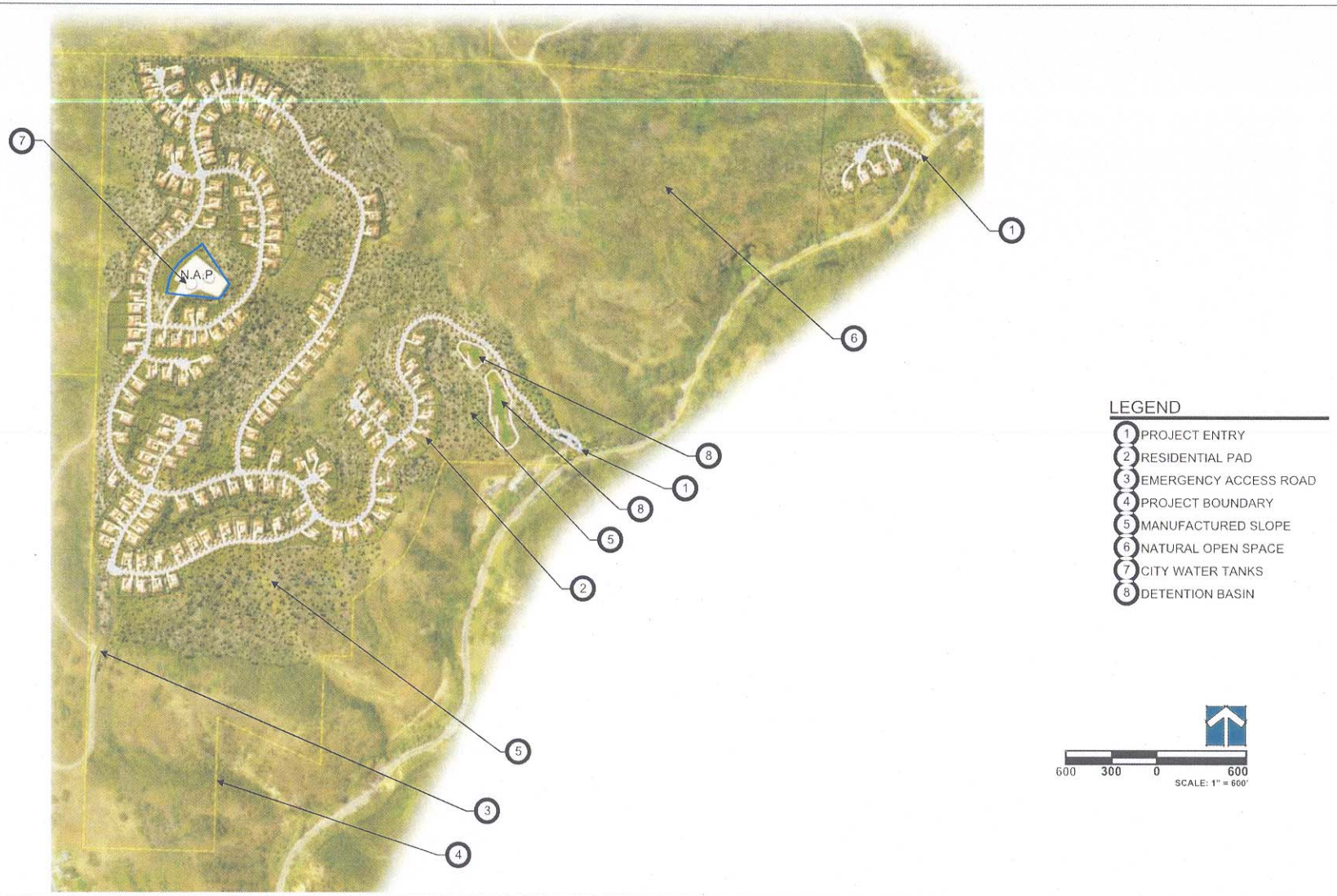
## LOT AREA TABLE

| LOT NO. | AREA (S.F.) | LOT NO. | AREA (S.F.) | LOT NO. | AREA (S.F.) | LOT NO. | AREA (S.F.) | LOT NO. | AREA (S.F.) |
|---|---|---|---|---|---|---|---|---|---|
| 1 | 38,903 | 51 | 14,076 | 101 | 42,467 | 151 | 26,043 | 201 | 15,753 |
| 2 | 28,863 | 52 | 17,749 | 102 | 13,719 | 152 | 14,705 | 202 | 10,942 |
| 3 | 24,104 | 53 | 14,535 | 103 | 17,494 | 153 | 12,202 | 203 | 12,527 |
| 4 | 22,365 | 54 | 20,804 | 104 | 14,812 | 154 | 13,768 | 204 | 25,437 |
| 5 | 30,538 | 55 | 14,810 | 105 | 15,446 | 155 | 13,696 | 205 | 17,001 |
| 6 | 32,276 | 56 | 18,096 | 106 | 14,618 | 156 | 16,163 | 206 | 12,895 |
| 7 | 23,996 | 57 | 11,895 | 107 | 18,066 | 157 | 15,020 | 207 | 12,058 |
| 8 | 17,858 | 58 | 14,676 | 108 | 26,279 | 158 | 21,192 | 208 | 15,288 |
| 9 | 11,997 | 59 | 18,973 | 109 | 38,450 | 159 | 13,967 | 209 | 17,502 |
| 10 | 18,354 | 60 | 14,748 | 110 | 18,551 | 160 | 16,750 | 210 | 21,082 |
| 11 | 28,291 | 61 | 18,148 | 111 | 14,181 | 161 | 18,895 | 211 | 22,908 |
| 12 | 18,574 | 62 | 18,337 | 112 | 14,227 | 162 | 19,229 | 212 | 19,698 |
| 13 | 15,170 | 63 | 18,277 | 113 | 13,180 | 163 | 16,441 | 213 | 16,541 |
| 14 | 13,174 | 64 | 21,116 | 114 | 16,744 | 164 | 18,901 | 214 | 15,219 |
| 15 | 28,924 | 65 | 13,602 | 115 | 31,023 | 165 | 24,771 | 215 | 14,146 |
| 16 | 25,288 | 66 | 15,541 | 116 | 36,121 | 166 | 24,154 | 216 | 15,585 |
| 17 | 27,675 | 67 | 24,634 | 117 | 28,837 | 167 | 18,301 | | |
| 18 | 16,759 | 68 | 21,219 | 118 | 16,850 | 168 | 10,106 | | |
| 19 | 12,053 | 69 | 14,035 | 119 | 16,513 | 169 | 11,461 | | |
| 20 | 11,756 | 70 | 14,402 | 120 | 20,327 | 170 | 11,652 | | |
| 21 | 14,903 | 71 | 20,185 | 121 | 23,375 | 171 | 13,575 | | |
| 22 | 14,095 | 72 | 26,254 | 122 | 22,278 | 172 | 12,785 | | |
| 23 | 12,138 | 73 | 18,389 | 123 | 14,973 | 173 | 12,764 | | |
| 24 | 10,691 | 74 | 15,223 | 124 | 19,346 | 174 | 12,359 | | |
| 25 | 19,658 | 75 | 21,073 | 125 | 12,296 | 175 | 14,066 | | |
| 26 | 14,253 | 76 | 23,703 | 126 | 13,937 | 176 | 15,766 | | |
| 27 | 10,255 | 77 | 14,557 | 127 | 11,568 | 177 | 24,439 | | |
| 28 | 11,865 | 78 | 16,730 | 128 | 10,690 | 178 | 26,366 | | |
| 29 | 15,380 | 79 | 13,725 | 129 | 17,960 | 179 | 17,409 | | |
| 30 | 17,660 | 80 | 16,962 | 130 | 26,696 | 180 | 16,494 | | |
| 31 | 29,850 | 81 | 18,581 | 131 | 17,979 | 181 | 17,100 | | |
| 32 | 25,560 | 82 | 20,262 | 132 | 20,766 | 182 | 11,168 | | |
| 33 | 22,537 | 83 | 21,190 | 133 | 18,980 | 183 | 12,753 | | |
| 34 | 28,567 | 84 | 16,109 | 134 | 16,089 | 184 | 17,324 | | |
| 35 | 22,773 | 85 | 13,606 | 135 | 19,581 | 185 | 14,758 | | |
| 36 | 17,863 | 86 | 18,895 | 136 | 25,312 | 186 | 22,124 | | |
| 37 | 23,821 | 87 | 17,160 | 137 | 18,241 | 187 | 10,883 | | |
| 38 | 26,623 | 88 | 35,987 | 138 | 13,708 | 188 | 11,658 | | |
| 39 | 19,369 | 89 | 28,465 | 139 | 14,474 | 189 | 13,458 | | |
| 40 | 15,325 | 90 | 29,521 | 140 | 12,500 | 190 | 18,358 | | |
| 41 | 11,909 | 91 | 21,153 | 141 | 12,586 | 191 | 16,002 | | |
| 42 | 11,506 | 92 | 21,383 | 142 | 19,377 | 192 | 12,912 | | |
| 43 | 16,383 | 93 | 18,727 | 143 | 17,872 | 193 | 15,538 | | |
| 44 | 14,316 | 94 | 21,467 | 144 | 11,876 | 194 | 16,823 | | |
| 45 | 18,752 | 95 | 18,948 | 145 | 10,922 | 195 | 14,588 | | |
| 46 | 12,562 | 96 | 17,714 | 146 | 8,206 | 196 | 15,747 | | |
| 47 | 13,749 | 97 | 17,306 | 147 | 8,853 | 197 | 13,915 | | |
| 48 | 13,149 | 98 | 17,674 | 148 | 10,144 | 198 | 11,395 | | |
| 49 | 15,166 | 99 | 18,203 | 149 | 16,643 | 199 | 11,704 | | |
| 50 | 15,198 | 100 | 20,048 | 150 | 17,934 | 200 | 27,636 | | |

Source: PBS&J

*Exhibit 3-4*

**Previous 216-Lot Subdivision Proposal (2002)**




*Source: Stantec, July 2007.*

***Exhibit 3-5***

# Proposed Development Plan

***Canyon Crest Recirculated EIR***