

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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September 27, 2007

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Initial Study with Proposed Mitigated Negative Declaration for the Proposed Improvement Project on State Route 57

JACK TANAKA
CITY OF DIAMOND BAR

Dear Ms. Taylor:

GARY WATTS
CALIFORNIA STATE PARKS

MICHAEL HUGHES
PUBLIC MEMBER
LOS ANGELES COUNTY

ELIZABETH CHEADLE
SANTA MONICA MOUNTAINS
CONSERVANCY

DICKIE SIMMONS
LOS ANGELES COUNTY
BOARD OF SUPERVISORS

The Wildlife Corridor Conservation Authority (WCCA) reviewed the Initial Study (IS) and proposed Mitigated Negative Declaration (MND) for State Route 57 Northbound Widening project (Project). **This letter is substantially similar to that letter previously sent by staff. This letter was adopted by the Governing Board of WCCA at its recent meeting.**

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. WCCA is most concerned with the anticipated growth-inducing and cumulative impacts, and the related impacts on biological resources, which were not adequately discussed in the IS/MND.

For this project, the California Department of Transportation and Orange County Transportation Authority propose to widen northbound State Route 57 (SR-57) by adding one through-lane for a length of 4.9 miles just south of Orangethorpe Avenue to just north of Lambert Road with auxiliary lanes between interchanges (IS/MND, p. 1). **The purpose of the project is to improve both existing and future mobility, reduce congestion, and improve mainline weaving, merge and diverge movements without substantial acquisition of right of way (IS/MND, p. 6). The project will reduce corridor delay by 20 percent. All of the study freeway segments are forecast to operate at a Level of Service F for forecast year 2030 without project conditions (IS/MND, p. 8).**

The IS/MND states that the Project will not induce population growth that would generate new traffic. Additionally, the IS/MND states that with mitigation measures, overall impacts to water quality, wildlife, and wildlife habitat will be less than significant.

The IS/MND fails to adequately identify, reduce, and mitigate long-term impacts on wildlife and wildlife habitat, related to growth-inducing and cumulative impacts. State Route 57 runs through the Puente-Chino Hills Wildlife Corridor. This wildlife corridor connects the Cleveland National Forest in Orange County and beyond to Puente Hills in Los Angeles County. The Project will ultimately increase the capacity of vehicles along State Route 57 and will facilitate density and development in the area, increasing pressure on the biological resources of the wildlife corridor.

Growth-Inducing and Cumulative Impacts and Need for Expanded Affected Area

The Affected Environment section (p. 30) appears to limit the analysis of the affected environment to within Orange County, in the cities of Placentia, Fullerton, and Brea. The IS/MND is deficient for not including a larger affected area in its study area, that includes portions of Los Angeles County, just north of the proposed project.

The IS/MND states that the Project does not provide direct connections to eastern and southern portions of Orange County, where the majority of undeveloped land exists (IS/MND, p. 30). The IS/MND (p. 30) states that the proposed project will improve vehicular circulation along northbound SR-57 within areas of the cities of Fullerton, Placentia, and Brea that are densely populated, and therefore the proposed project would not induce development in the project area. The IS states that the Project could slightly accelerate or facilitate urban growth and potentially induce a minor increase of pressure to develop in areas that currently not planned for development, particularly in areas where local general plans anticipate growth (e.g. City of Brea, City of Fullerton, and City of Placentia). However, later the IS/MND (p. 31) states that no impact to growth would occur.

Although the Project is located in a highly urbanized area, the impacts of the Project will extend beyond its study area. The Project will provide an improved north-south access route to Los Angeles County, particularly through unincorporated Orange County, unincorporated Los Angeles County, and the City of Diamond Bar. The impacts of the project are not limited to the footprint of the project; the project would increase capacity, which facilitates travel to the nearby open space lands in Los Angeles County roughly 4,000 feet to the north of the SR-57 project.

Notably, the Aera Master Planned Development Project has been proposed just to the north of the proposed project site, and SR-57 passes through the Aera development site. This is a huge project, currently in the development review process, that could potentially consist of 3,600 homes on approximately 2,935 acres. The IS/MND is deficient for not considering the relationship of the proposed SR-57 project to the Aera project.

WCCA maintains that this project is in fact growth-inducing as it removes obstacles to population growth (i.e., reduction of traffic congestion) and facilitates other activities (e.g.,

residential development in nearby Los Angeles County) that are expected to cause significant adverse environmental effects. **The** IS/MND fails to address the increased development potential of the undeveloped land just north of the SR-57 project in Los Angeles County.

The IS/MND also does not address the cumulative impacts of this SR-57 project, in the context of other projects such as the proposed the State Route 91 Eastbound Lane Addition Project Between State Route 241 and State Route 71, and other future freeway widening projects along the 57 and the 91, which would have growth-inducing impacts. These projects combined with other projects such as the Canyon Crest project have the potential to significantly affect the wildlife corridor. WCCA is primarily concerned with the growth-inducing nature of these projects and their combined impacts on the wildlife corridor from all associated development.

Relieving congestion on these freeways, facilitates construction of the nearby proposed developments, which cumulatively will result in significant adverse effects to biological resources in the wildlife corridor. These direct impacts include fragmentation of the wildlife corridor, loss of sensitive native plant communities, and loss of sensitive wildlife species. WCCA is notably concerned about the cumulative effects on the Tonner Canyon undercrossing at SR-57, located just north of the Project.

Need for Mitigation for Growth-Inducing and Cumulative Impacts

WCCA recommends that the California Environmental Quality Act (CEQA) document include measures that will either avoid or mitigate the growth-inducing and cumulative effects, that could lead to the potential loss and fragmentation of wildlife habitat within the Puente-Chino Hills Wildlife Corridor. WCCA recommends that Measure M funds, or some other funding source, be allocated to fund both habitat acquisition and restoration that is directly tied to preserving the resources within the Puente-Chino Hills Wildlife Corridor. **The acquisition of additional right-of-way along the freeway corridor may be critical. At a minimum, \$10 million must be set aside for land acquisition.**

Consistency with Watershed Plans

Approximately 165 square miles of highly urbanized communities drain into the Coyote Creek and Carbon Creek watershed. The IS/MND identified Carbon Creek, a blue line stream, and Loftus Channel which drains into the San Gabriel River. Because the Project is within both Coyote Creek and Carbon Creek Watershed, WCCA recommends that the CEQA document take into consideration the goals and objectives of the recently released Coyote Creek Watershed Management Plan (2007) and the watershed plan for the San Gabriel River watershed called Common Ground, from the Mountains to the Sea (2001).

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Thank you for your consideration of these comments and recommendations. Please direct further inquiries and comments to Judi Tamasi of our staff at (310) 589-3200, ext. 121, and judi.tamasi@mrca.ca.gov.

Sincerely,

Bob Henderson
Chairperson