Letter No. 14

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March 3, 2008

COMMUNITY DEVELOPMENT
MAR 03 2008
DEPARTMENT

Joan Wolff, Project Planner
Development Services Dept.
City of Fullerton
303 West Commonwealth Ave.
Fullerton, CA 92832

Re: Recirculated Revised Draft Environmental Impact Report SCH No. 1997051056
West Coyote Hills Specific Plan and Robert E. Ward Nature Preserve
January 2008

Dear Ms. Wolff:

1 Thank you for the opportunity to respond to the above Recirculated Revised Draft EIR (RRDEIR) and specific plan. I have several comments and questions, many of which relate to insufficiencies and omissions in the document. Please include my comments and questions as well as the answers to my questions in the Administrative Record.

I submitted comments and questions on June 8, 2006 to the RDEIR of March 2006 and assume that those will be acknowledged and responded to in the Final EIR for this site. I include them by reference as part of this document.

2 **Comment 1**: 4.9-9 Public Health and Safety; Hazardous Wastes Sites/McColl Site
Since McColl is a Superfund Site, hazardous substances, pollutants and contaminants still remaining on the site may become a risk to human health. This site is right next to Clark Regional Park across Rosecrans from the West Coyote Hills site.

The site contaminants were not removed but contained which means that the McColl site is regulated by the EPA. The September 2003 Draft Environmental Impact Report SCH No. 19997051056 mentions the McColl site on pp 4.9-5 and 4.9-6. As of the RDEIR of June 2006, the site contaminants were monitored in off-site monitoring wells to determine if there is seepage from the site into ground water. No groundwater wells could be installed on the site and the Orange County Water District was testing well sites in the water basin to determine if contamination from the site has moved off site into

drinking water aquifers. There is a mandatory review of the site status every five years; the next one was scheduled for 2007 (US EPA, 9/1/2005).

Chevron Texaco was one of the four oil companies that were held responsible for the cleanup (Associated Press, Feb. 13, 2002) of 72,600 cubic yards of petroleum waste sludge and additional drilling mud that was deposited on the site (EPA, June 2002).

2

This RRDEIR still has the EXACT same statement about the McColl Site (p 4.9-9) as did both the September 2003 DEIR and the March 2006 RDEIR. The final paragraph says there is a gas collection and treatment plant operating on the site with regular inspections. It also states: "The McColl site is currently eligible for deletion from the National Priorities List. Deletion of the McColl site from the NPL is expected after the conclusion of pending litigation between the U.S. Government and the McColl Site Group of Oil Companies."

Questions:

About McColl:

3 1. Why hasn't this statement been changed since it is five years old? It the litigation still going on? Has any progress been made?

4 2. Is the site still being inspected? By whom?

5 3. Will the description of the McColl Superfund Site be updated in the Final EIR to give a status report?

About West Coyote Hills:

6 4. How many of and in what quantity are the same contaminants present in the McColl site still present on the West Coyote Hills site?

7 5. What methods are going to be used to clean them up and which regulatory agency is going to approve a Workplan and verify and monitor the clean up?

8 6. If contaminated soils and other materials are to remain on the West Coyote Hills site, will prospective buyers of the proposed residential units be advised (1) that this site was previously a densely used oil field with about one oil well for every 2.5 acres and (2) that contaminated soils that cannot be cleaned up to human health standards still remain on the property?

9 7. Since the RDEIR states that only the top ten feet (10 ft.) will be cleaned up, will prospective buyers be advised of the levels of toxic pollutants (including volatile organic compounds) that may be present below ten feet?

10 8. Will these prospective buyers also be advised as to who will be responsible if any adverse effects to human life and property result over the long term because of the polluted nature of the property?

11 9. Will the city of Fullerton be responsible? Will Chevron and/or their subsidiary Pacific Coast Homes or their stockholders be responsible?

12 **Comment 2**: I have several comments relating to the repeated assertion in the RRDEIR that the plant community at West Coyote Hills is species poor.

12 The RRDEIR repeatedly states that the Coastal Sage Scrub plant community is "extremely species poor" and compares it to two sites one of which has a different plant community on it in addition to the CSS community and the other of which is eight times the size. The Arroyo Trabuco Golf Course (although similar in size—640 acres compared with 510 acres at West Coyote Hills) has not only CSS but also a riparian plant community which accounts for the additional number of native species. The Irvine Co. Planning Area 1 is eight times the size at 4200 acres and I would assume also has riparian and chaparral communities and possibly others on it which of course adds to the number of native species. These are proverbial "apples and oranges" comparisons.

A comparable site is Baldwin Hills (located in Los Angeles at La Cienega Blvd.) which is a coastal sage scrub community also on the coastal plain at a similar latitude; it was also a former oil field. Although Baldwin Hills is twice the size of West Coyote Hills (about 2 square miles) it only has 72 native plants* on it compared with "91 native [plant] species" (p. 4.12-7) at West Coyote Hills. (*Community Conservancy International et al., A Walk on the Wild Side: Plants & Animals of the Baldwin Hills, 2001)

13 Is the statement "In areas of comparable size in southern San Diego County, significantly greater numbers of native species have been documented." simply a red herring intended to fool the reader into agreeing with the erroneous statement that the West Coyote Hills "CSS community is extremely species poor." (p. 4.12-7) It is well know by botanists that species richness in CSS is higher the farther south the latitude, and that San Diego County CSS is more species rich than are Ventura, Los Angeles and Orange counties.

14 The RRDEIR also contradicts itself first stating that "Typical numbers of native plant taxa for 100- to 300-acre sites that support scrub communities are generally in the range of 90-125 species. Then it states that "the Fullerton site is comparatively floristically poor in species richness when compared to other sites (137 species total; 91 native (66 percent ; 46 non-native (34 percent)." The 91 native species at Coyote Hills meets the stated criteria for "typical species richness." (p. 43.12-7) Again since the Irvine Co. Planning Area 1 is eight times the size (at 4200 acres) of the West Coyote Hills site, there is no valid basis for comparison of species richness. In fact it appears that the West Coyote Hills site is substantially richer in species for its size than the Irvine Co. site.

15 **Questions**: Did biologists/botanists make these statements? Was something left out of their analyses?

16 **Comment 3**: The RDEIR March 2006 and the RRDEIR January 2008 seriously underestimate the impact of the project on the California Gnatcatcher, because the Biological Opinion was based on Gnatcatcher populations and territories (use areas) that were outdated and therefore incomplete. The survey was from 1998 (Exhibit 4.12-2). The Bonterra survey of 2004 (Exhibit 3 in Appendix 14.12-3 of the March 2006 RDEIR) not only shows 12 more pairs and 72 juveniles, but also documents the fact that California Gnatcatchers are occupying more areas on the site. I understand that the

16 difference in the number of pairs between the two surveys is within the normal fluctuation of gnatcatcher populations. This is not my point.

17 My point is that since the cessation of oil extraction in 1990, the site has had less human activity and the flora has been allowed to regenerate throughout the site. An example of this regeneration can be seen in the Ward Nature Reserve which has had no human activity for a number of years more than the rest of the site. Here floral coverage is almost complete, except for the traces of paved and packed roads. This means that more mature habitat is available to the fauna on the site, including the California Gnatcatcher. It follows that the site can now support more gnatcatchers and other fauna than it could when the 1998 survey was completed.

18 Table A, below, shows the actual impact that the proposed development will have on the CAGN. The figures were determined by superimposing a scaled copy of the Cut and Fill Exhibit 4.11-3 on the 2004 Bonterra Exhibit 3, Appendix 14.12-3. The footprint of the final developed area including non-native open areas and easements closely matches the grading (cut/fill) footprint. See attached map: California Gnatcatcher Territories Impacted by Grading.

Table A: California Gnatcatcher (CAGN) Pairs in the 2004 Bonterra Survey and the Impact of Development on Their Territories*

Total CAGN Territories	Territories 100% Destroyed	Territories >75% Destroyed	Territories 50-75% Destroyed	Territories <50% Destroyed	Territories Not Impacted
60	15	5	9	16	15
% of Total	25%	8%	15%	27%	25%
Projected Survival	0	1-2	3-5	8-10	15

*An itemization by pair is attached as Table B.

Even with the "phasing" of development proposal, 75 percent of California Gnatcatcher (CAGN) territories will be impacted by the grading and subsequent structures, roads, easements and development. At best 50 percent of the California Gnatcatcher population will persist, which means that 50 percent will be "taken", not 22 percent as stated in the RDEIR. Even CAGN pairs whose territories are partially within the Ward Nature Preserve will be heavily impacted.

19 Note also that the RDEIR Table 4.12-7 is not only incorrect in the number of CAGN that will be impacted (13) instead of the actual figure (45 as shown in Table A above, but also that 15 of the 45 impacted territories will be totally destroyed (or taken). The attached map illustrates this fact. Table B (attached) itemizes how each pair will be impacted.

Comments on the 2004 Bonterra Survey:

20 1. The RRDEIR states that the surveys "were taken after the breeding seasons had ended." (p 4.12-20 and 4.12-55) This is not true: the surveys were conducted from June 24 to August 12. The breeding season for CAGN is late February through mid-July (Kaufman, p. 463). CAGN are know to have an extended breeding season with several clutches. In an Orange County study, the mean number of nest attempts was 3.3 with a range of 1 to 10 (Atwood and Bontrager, 2001).

21 2. The RRDEIR states that the site was visited by 6 biologists in a single morning (p. 4.12-20). This is also not true as the Bonterra Survey shows that the site was visited 6 times in each of the six sectors.

22 3. The RRDEIR claims that the Dudek supplemental analysis was more valid than the Bonterra survey. Bonterra followed a protocol; Dudek was walking around the site for other purposes and claimed to notice over the years that the site had not changed in any substantive way. This is not a scientific method that can lead to a scientific conclusion.

23 To claim that the 1998 CAGN survey is still valid as to CAGN nest locations while the 2004 Bonterra survey has little value except to confirm that CAGN are present on the site is scientifically inaccurate since CAGN life expectancy is a maximum of 6 years (Atwood and Bontrager, 2001). It is also absurd to claim that the vegetation on the site hasn't changed in ten years when there has been little activity on the site.

Comment 4: Given the information above and below, please explain how the patches of CSS at the edges of the proposed development will remain viable in perpetuity so that CAGN recovery will be aided.

24 The Endangered Species Act provides protection for species that aids them to recover so that they can be delisted. The various mitigations stated in the RRDEIR do not lead to the recovery of the CAGN on the site or in the region. On the contrary, the RRDEIR states many valid impacts on pp. 14.12-57-58 and then says "as a result of the following mitigation measures...it was anticipated that the vast majority [of impacts]...would be temporary." This is at best wishful thinking. The West Coyote Hills CAGN population is obviously surviving on its own. In fact West Coyote Hills is a CAGN stronghold, only one of two in the region. To destroy the heart of the site will destroy any possibility that the CAGN will recover in this region and be able to survive in perpetuity on its own without mitigation and human monitoring and help.

25 The fact remains that the heart of the site will be occupied by structures, streets, yards, groomed areas with non-native vegetation, roads and easements, while only the edges of the site will remain as possible habitat for the CAGN. Very little, if any, suitable habitat will remain on the entire western section between Gilbert St. and Beach Blvd.

25 The California Gnatcatcher is a sedentary, interior species—remnants of land squeezed between developed areas are therefore not suitable habitat. It is to be noted that the CAGN expands its foraging range during the nonbreeding season; this results in up to an 80% increase in home range territory. Success of the gnatcatcher in West Coyote Hills may be a result of there being enough foraging area available during the nonbreeding season. (Atwood and Bontrager, 2001).

26 On the eastern section, the heart of a densely CAGN inhabited area will be permanently removed. Here too, rather than maintaining a block of interior habitat, an extensive edge will be created, compromising the ability of the gnatcatcher to survive over the long term. Reduction of habitat leads to crowding with neighboring pairs, thereby reducing reproductive output (Atwood and Bontrager, 2001).

27 Fragmentation of the habitat is extreme: The Project as proposed by Chevron PCH carves up the site to such an extent that the pieces of CSS habitat that remain are mere fragments (many of which are unconnected) that remain around the edges of the developed area. This type of fragmentation causes rapid extinctions of chaparral requiring birds (Soule et al., 1988). Since this is the largest population of California Gnatcatchers in the northern half of their historic range (Crabtree and Thelander, 1994), severely decreasing their population can jeopardize the remaining groups of California Gnatcatchers in the region. Does is make sense of is it legal under the ESA and CEQA to cut up their habitat into patches when they are currently thriving on their own without human assistance?

28 Incidentally, Exhibit 4.12-2 is labeled "Sensitive Animal Species." The only animal species indicated on the map is the California Gnatcatcher. There are other sensitive species documented in the RDEIR, such as the Coastal Cactus Wren, Cooper's Hawk and Loggerhead Shrike. Both the Cactus Wren and Cooper's Hawk are breeding on the site. Shouldn't they be included on such a map, given both are CDFG Species of Special Concern?

29 **Questions:** How many Coastal Cactus Wren territories will be destroyed by the proposed development: Has a CDFG survey be done? Since the Cactus Wren is a California Species of Special Concern, shouldn't a survey be conducted?

<u>Comment 5</u>: Cumulative Impacts (pp 4.12-63-65)
The main purpose of the cumulative impact requirement is to make sure that a series of small projects are not approved without consideration of the overall effect of these actions on the environment. Several case law examples have upheld this requirement.

30 Chevron and/or Pacific Coast Homes (a fully owned subsidiary of Chevron) has already developed about 1000 acres of their Coyote Hills property contiguous (both south and north) with the West Coyote Hills site that is the subject of this RRDEIR. It is noted on p. 4.12-63 that the development to the south occurred "prior to the designation of CSS habitat as a sensitive habitat." However this is not true of the 381-acre site adjacent to

30 the north. When this site was going through the EIR process, it was objected to by the Sea and Sage Chapter of the National Audubon Society who pointed out in writing and in testimony that the Chevron oil lands should be considered as a whole, not piecemealed. See map of Previously Developed Land Contiguous with West Coyote Hills, attached.

31 In addition, the RRDEIR states (p. 4.12-63) that the recent development of Hawks Point and Emery Ranch projects (approx. 200 acres which are contiguous on the west) "have contributed to the cumulative loss of biological resources including CAGN, cactus wren and other special status species habitat...."

- Twenty pairs of California Gnatcatchers and an unknown number of Coastal Cactus Wrens were taken when the adjacent property in La Habra was developed. [Property is located south of Imperial Hwy between Beach Blvd. & Euclid.]
- None of the "quality coastal sage scrub and southern cactus scrub habitat" remains on the La Habra property (Harper, 1992).
- It is not know how many Coastal Cactus Wrens were taken as a result of the Hawks Point/Emery Ranch developments.

To rectify this egregious error under CEQA, the cumulative losses of CSS habitat, CAGN, Coastal Cactus Wrens and other sensitive species must now be considered when reviewing this site for development. Note that Chevron was the owner of the La Habra site.

32 It goes without saying that Chevron/Pacific Coast Homes knew that it would be developing the rest of the West Coyote Hills oil field back as far as when it began to abandon its wells and convert this oil field to a residential/commercial development. Since the early 1970s it has been dividing up the site for development.

33 Further, although the RRDEIR mentions the two parcels totaling 64.4 acres that have been previously allocated as Section 7 and Section 4(d) mitigation (Exhibit 4.12-7), it still counts them as mitigation credit for the current proposed development. It also infers that the 72-acre Ward Nature Park (which is owned by the City of Fullerton) is part of the remaining CAGN and sensitive species habitat that should be credited as CSS/CAGN mitigation for this development. This is double counting and not allowed under CEQA.

Questions:

34 1. When USFWS allowed the take of 20 pairs of California Gnatcatchers on the Chevron property between Imperial Hwy and the northern boundary of this site, wasn't the decision based on the fact this 510-acre site was still available to them?

35 2. Isn't is possible that the recent losses plus the projected losses of California Gnatcatchers (see comment 2) and Coastal Sage Scrub habitat could easily jeopardize the entire population of California Gnatcatchers in the region?

36 3. How is it possible that there will there be more CAGN on the site as a result of the development and fragmentation of the site when the site is already populated throughout with CAGN pairs? The applicant's hope that "habitat would be expected to be offset by" mitigation measures (p. 4.12-64) is so tentatively stated

36 throughout that there is no assurance that any or all of the mitigation measures are realistic.

37 4. Given that virtually the entire site is designated critical habitat for the CAGN, how is it possible that, after the proposed development even with proposed enhancement of CSS, there will be less edge (p 4.12-52 and others) than currently exists in the critical habitat? The outline of the proposed developments on the site creates approx. three more miles of edge than currently exists.

38 **Comment 6:** Both Section 4.12 and the Biological Opinion state that construction will be phased to allow for revegetation prior to "impacting 5 gnatcatcher pairs in Phase II." There is no mention of how long the revegetated areas will be allowed to grow before the beginning of Phase II. There is no mention of Phase III.

39 **Questions**: How long will the revegetated areas be allowed to grow before the destruction of habitat that will take place in each phase? How long (years, months) will the revegetated areas be allowed to grow between Phase I and Phase II and between Phase II and Phase III?

40 **Comment 7:** Reserve Design. The RRDEIR completely ignores what constitutes currently accepted design requirements for a healthy natural reserve in Coastal Sage Scrub. The fact that the RDEIR does not mention reserve design at all is a fatal omission (especially since the Robert Ward Nature Park is part of this RDEIR). The fragmented natural landscape created by the project plan is contrary to what is known about the configuration and minimum acres needed to sustain this natural system.
There is a large body of scientific work that covers reserve design; see Forman & Godron, 1986; Forman, 1995; Dramstad, Olson, Forman, 1996; among others.

41 **Comment 8:** "The Biological Opinion states that "a management endowment will be established to provide for the perpetual management of the preserve." As mentioned above this perpetual management doesn't adhere to the spirit of the Endangered Species Act which endeavors to aid in the recovery of species. Note the American Eagle which was recently removed from the ESA list as endangered.

Questions: Will the $1,334,294.00 that PCH will be putting into trust to monitor and maintain the site for invasive species, and preservation of the sites flora and fauna be sufficient to do so in perpetuity? What factors were used to calculate this "management endowment? Who will manage these funds? If the funds run out, who will take over this responsibility?

42 **Comment 9:** (Appendix 14.14-1) This section states that Chevron/"Pacific Coast Homes" and/or its successors and assigns will manage ...the preserve in perpetuity." It

42 seems likely that Chevron/PCH through its wish to develop this site is planning to divest itself of the site.

Questions:

43 1. How will its "successors or assigns" be selected? Who will select them? Who will they be responsible to? Chevron/PCH? The City of Fullerton? Or some other entity?

44 2. Who will monitor them to assure that they are properly maintaining the preserve?

45 3. Will the city of Fullerton be required to continued this commitment to monitor and maintain the site in perpetuity? Or will the site just be allowed to convert to a weed patch with little or no habitat value?

46 Since the edge effects of this site will be extreme because it is so fragmented, monitoring and maintenance is the only way to assure the survival of the protected plants and animals if the site is developed as proposed.

47 **Comment 10:** (Appendix 14.12-1) The RDEIR is contradictory and unclear about the coyote. It gives no indication of how the coyote will survive in this severely fragmented landscape. However it does say that coyotes will be "stressed by loss of habitat and increased potential for canine distemper."

Question: Does this mean that the coyote is expected not to survive in the long term?

48 Then the RDEIR states that "Successful California gnatcatcher recovery will be dependent on mesopredator control by coyotes" which will also benefit other small animals.

Question: If the coyote does not survive, is the California Gnatcatcher not expected to persist either, since its "recovery is dependent on mesopredator control by coyotes"?

49 Then it says that "no coyotes will be trapped in the preserve."

Question: Does this mean that residents in the development will be able to trap and/or poison coyotes?

50 **Conclusion**

After reading the RDEIR, it is clear that, just as the leaders of our country wisely began setting aside special parcels of land as national and state parks in the Nineteenth Century, this 600-acre West Coyote Hills site should be set aside in its entirety. What remains of West Coyote Hills is extremely unique. It is not just a former oil field or a desolate vacant piece of land. It is a thriving ecosystem alive with plants and animals, many of which are rare and endangered—AND it has been thriving on its own without the assistance of monitoring and maintenance.

51 The site is Endangered Species Act "Critical Habitat" and as such is set aside for the recovery of the Coastal California Gnatcatcher. If developed this last California Gnatcatcher stronghold in the area will have to be maintained and monitored in perpetuity and will not assist in the recovery of this species.

52 Why should West Coyote Hills be allowed to remain in its current natural state? Because it is the only surviving area of vibrant coastal sage scrub in north Orange and southern Los Angeles counties. Coastal Sage Scrub once covered much of coastal southern California. Now more than 95 percent of it is gone. We owe this legacy to our children and to our children's children.

53 If this proposed construction occurs, the heart of the site will be consumed by structures, streets, and fenced yards. The fragmentation will be so severe that it will have to be maintained in perpetuity as the RDEIR Biological Opinion requires. People visiting the site will not have the experience of being in a natural setting even though the fragments around the edges of the housing units may be maintained. When walking through the site one will be constantly aware of the structures, walls and streets.

54 In this era of windfall profits, Chevron and its stockholders would not notice the small profit that destruction of this site through development would provide. In fact the value of this property is not even a rounding error in the Chevron annual report. The City of Fullerton is unlikely to realize anything but a minimal amount of sales tax revenue. On the other hand, current and future generations will benefit if the site is allowed to remain in its entirety.

Sincerely,

Diane Bonanno

Diane Bonanno

Attachments

References:

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U.S. Environmental Protection Agency. Region 9. EPA Superfund Site Explanation of Differences: McColl. EPA ID CAD980498695. OU 04. Fullerton. CA. 09/01/ 2005. [available www.epa.gov/superfund/sites/rods/fulltext/e0905047]

TABLE B

Impact of Development on Specific California Gnatcatcher Territories

The following list itemizes the percentage of impact from development on each California Gnatcatcher pair noted in the Bonterra 2004 survey (Exhibit 3 in Appendix 14.12-3 of the 2006 RDEIR).

Territories Permanently Destroyed in Their Entirety: 15
Pair Numbers: A06, A15, B03, B04, C04, C08, C11, D10, E03, E12, E13, E14, E16, E19, F04

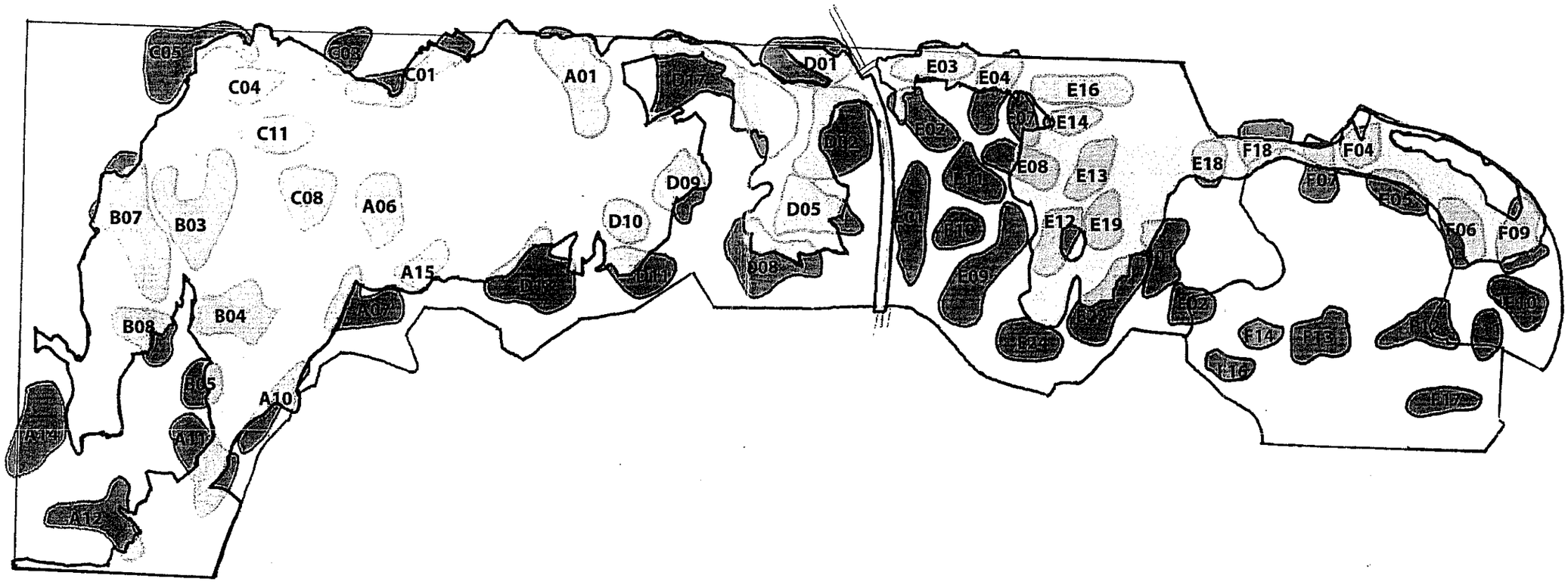
Territories More Than 75 Percent Destroyed: 5
Pair Numbers: A01, B07, D05, D09, E18

Territories Between 50 and 75 Percent Destroyed: 9
Pair Numbers: A10, B08, C01, D01, D17, E08, F06, F09, F18

Territories Less Than 50 Percent Destroyed: 16
Territories Within Chevron PCH Property: 14
Pair Numbers: A07, A11, A12, B05, C05, D02, D08, D11, D13, E02, E04, E07, E22, F01
Territories Within Both the Chevron PCH Property and Ward Nature Preserve*: 2
Pair Numbers: F05, F07

Territories Not Impacted: 15
Territories Within Chevron PCH Property: 8
Pair Numbers: A14, C03, E01, E09, E10, E11, E24, F10
Territories Within Both the Chevron PCH Property and the Robert Ward Nature Preserve*: 3
Pair Numbers: F02, F11, F12
Territories Entirely Within the Robert Ward Nature Preserve: 4
Pair Numbers: F13, F14, F16, F17

* The territories of these pairs are on both the Chevron PCH property and in the Robert E. Ward Nature Reserve.D. Bonanno, page 9



Observed Territories of California Gnatcatcher Pairs (2004 Bonterra Survey)

Pacific Coast Homes Proposed Graded Area

N
W
E
S

800 0 800 Feet

West Coyote Hills California Gnatcatcher Territories Impacted by Grading

Map of Previously Developed Land Contiguous with West Coyote Hills