March 8, 2024

Chairman Donald Wagner

Orange County Board of Supervisors

400 W Civic Center Drive

Santa Ana, CA 92701

Sent via email to: Donald.Wagner@ocgov.com

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Re: Request for New Environmental Impact Report for Saddleback Meadows Project

Dear Chairman Wagner and Board of Supervisors:

The Orange County Chapter, California Native Plant Society (OCCNPS) respectfully requests that the County of Orange require a new Environmental Impact Report (EIR) for the proposed Saddleback Meadows development project. While a subsequent Environmental Impact Report (EIR 566) was completed in 2001, significant changes have occurred since then, rendering the existing document inadequate to assess the project's current environmental impacts.

Please include this letter in the official record for the project.

Rationale for a New EIR:

- **Habitat Loss and Sensitive Species:** The 2001 EIR estimated 40 acres of coastal sage scrub would be impacted by the project, with a total project area of 222 acres. This valuable habitat type supports a diverse range of species and the following threatened species have been documented within the project area: coastal California gnatcatcher, one CNPS Rank 1B species (*Calochortus weedii* var. *intermedius*), and two CNPS Rank 4 species (*Calochortus catalinae* and *Microseris douglasii* ssp. *platycarpa*). The EIR also references an unidentified *Hemizonia* sp., which has a high likelihood of being *Deinandra paniculata* (CNPS Rank 4), and fails to include *Nolina Cismontana* (CNPS Rank 1B) as a Special Status species with potential to occur within the project area. While neither of these species were included in the EIR, both of these species are known to occur in the surrounding area. Additionally, many species within the coastal sage scrub community continue to face significant threats from development, with 21% of *Calochortus weedii* var. *Intermedius* and 17% of *Nolina cismontana* populations currently threatened by development alone. A new EIR must comprehensively assess the current state of these species.
- **Increased Fire Threat:** Since 2001, California has experienced 17 of its 20 most destructive wildfires and 18 of its 20 largest wildfires. Four wildfires exceeding 5,000 acres have burned

in habitat near the project area, totaling more than 70,000 acres. A new EIR must evaluate the project's impact on fire risk in light of these significant changes and assess potential impacts on already-imperiled habitats.

- **Population Growth and Traffic:** Orange County's population grew by over 10% from 2001 to 2021. This, coupled with increased traffic, necessitates a reassessment of the project's potential impacts on local habitat, infrastructure, air quality, and noise pollution. The 2001 EIR's analysis is outdated and insufficient to address these current concerns.
- **Climate Change:** While coastal sage scrub already faces a challenging future due to development, projections indicate a 30% loss of current coastal sage scrub habitat due to climate change–coastal sage scrub communities currently cover only 15% of their historical area. A new EIR must assess the project's potential to exacerbate habitat loss and endanger sensitive species that are increasingly threatened due to climate change.

Conclusion:

The significant changes since the completion of the 2001 EIR necessitate a new EIR for the Saddleback Meadows project. This updated document is crucial to ensure a thorough and accurate assessment of the project's potential environmental impacts and allow for informed decision-making. We urge the County of Orange to require a new EIR to adequately protect our valuable native habitats and sensitive species.

Thank you for your time and consideration. We look forward to working with you on this important issue.

Sincerely,

Christopher Gort

Conservation Committee

CNPS OC Chapter

Elizabeth Wallace

President

CNPS OC Chapter