

7/11/2019

Edcgov.us Mail - Public comment on Sierra Sunrise Project in Cameron Park

PC 7/25/19
#2
12 pages



Charlene Tim <charlene.tim@edcgov.us>

Public comment on Sierra Sunrise Project in Cameron Park

Danae Aitchison <djaitchison@comcast.net>
To: charlene.tim@edcgov.us

Thu, Jul 11, 2019 at 12:57 PM

Ms. Tim: I am submitting the attached comment letter for consideration by the Planning Commission in connection with the Sierra Sunrise project.

I will also send this letter by first class mail today.

Thank you very much for your assistance.

Danae Aitchison
djaitchison@comcast.net

 **Comment Letter on Sierra Sunrise Project.07-11-19.pdf**
5535K

*Sent by first class mail and by email
to charlene.tim@edcgov.us*

July 11, 2019

El Dorado County Planning Commission
c/o Planning Services
2850 Fairlane Court
Placerville, CA 95667

Re: Sierra Sunrise CEQA initial study/proposed negative declaration and Tentative Map 17-1532

Dear Ms. Tim and Planning Commissioners:

I am writing to comment on proposed tentative map 17-1532 and the accompanying CEQA initial study/proposed negative declaration. To prepare these comments, I reviewed the proposed negative declaration, along with materials about this project prepared for the prior Planning Commission meeting on September 13, 2018. I am also familiar with the project site since it is in my general neighborhood and I walk along Woodleigh regularly. Please note that while I received a copy of a mailed notice in June 2019, I never received a mailed notice about this project previously. Notice on the project site itself was not posted until recently – I first saw the site was posted on July 3, 2019 when I walked along Woodleigh.

I support infill development. There are numerous vacant parcels in Cameron Park that merit being developed because they are relatively flat, have vegetation with low habitat value, and are not connected to other parcels with habitat value. These types of infill parcels certainly merit development in advance of any consideration of developing the rugged, densely wooded area south of Highway 50 in Cameron Park (Marble Valley area), or vacant parcels north of Highway 50 that provide important habitat value. This project, however, would develop two long-vacant parcels that are covered with dense chaparral habitat.¹ The project site contains pine trees, as well as a thick coverage of manzanita and chemise, much of it reaching 6 feet high or more. Many species have come to rely on this habitat for movement between other areas of Cameron Park, including adjacent parcels along Woodleigh, Wilkinson, Hillcrest and Estepa, some of which remain undeveloped and also contain dense chaparral habitat. Species also use these parcels for foraging, breeding, and rearing young. The rich variety of wildlife species that use these vacant parcels play an important role in the community character and aesthetic quality of Cameron Park. The presence of wildlife helps make Cameron Park the great community that it is.

Unfortunately, this infill development proposal, due to its location and the existing conditions on the project site, will eliminate important habitat that is actively being used by a variety of wildlife species, with attendant biological, aesthetic, and community character impacts. These impacts are not

¹ Woodland chaparral in El Dorado County occurs at elevations between 1000 as 3500 feet. (See <https://www.eldoradocnps.org/plants/ecology>.)

disclosed in the CEQA initial study/proposed negative declaration, which appears to be based on outdated facts about species use of the project site. As explained below, the proposed negative declaration's failure to address the proposed project's significant biological effects is inconsistent with the California Environmental Quality Act. A negative declaration is appropriate only where there is no substantial evidence to support a fair argument that the project will cause a significant adverse environmental impact. Here, due to the extensive vegetation on the project site, removal of the vegetation to support residential development will in fact have a significant adverse environmental impact. Project approval should be conditioned on avoiding direct impacts to species, indirect impacts to species from habitat loss, and loss of wildlife migration areas.

Biological Resources – species currently using the parcels and adjacent natural areas as habitat and for movement

The area bordered by Woodleigh, Wilkinson, Hillcrest, and Estepa includes dense chaparral habitat, including chemise, Manzanita, pines, and a variety of smaller vegetation, including lady slipper. The map included with this letter (Attachment 1) provides a Google earth view showing the project site in yellow, and also showing the similar habitat immediately across the street and below the project site either side of Wilkinson, as well as on the opposite side of Woodleigh, below the existing houses. I have included photographs taken from standing on the street on Woodleigh of the project site (Attachment 2). The CEQA initial study/proposed negative declaration's description of the existing conditions on the project site does not fully characterize the site.

I have personally observed the following wildlife species on and in the immediate vicinity of the project site during walks along Woodleigh, Wilkinson, Hillcrest, and Estepa:

- Quail
- Turkeys
- Jack Rabbits
- Skunk
- Deer
- Multiple bird species

I have personally watched deer emerge from yards on Woodleigh Lane opposite the project site. The deer cross Woodleigh, and enter the proposed project site, obtaining cover in the dense chaparral. Recently, in early June, I have observed two deer (male and female) moving in the area of the proposed project on vacant parcels that are immediately across Wilkinson. I have enclosed a photograph. (Attachment 3.) Just a few days ago, after not seeing the male deer for two days, I observed the female with a fawn. (Attachment 3.) As I walked by, the fawn retreated into the dense chaparral habitat on vacant parcel bordered by Estepa and Wilkinson, which is immediately down the hill and across the street from the project site. The mother followed. The use of the project site to move between nearby parcels is evident by deer trails. I am enclosing photographs showing the deer trails that connect the currently vacant parcels on both sides of Wilkinson including parcels immediately adjacent to the project site. (Attachment 3.)

Despite these very recent observations of deer using the habitat on the proposed project site, and on parcels adjacent and across the street, the proposed Negative Declaration states that there is no impact to migration corridors. (See IS/Env't Checklist Form, p. 15.) The document states that "Review of the Department and Fish and Wildlife Migratory Deer Herd Maps and General Plan DEIR exhibit 5.12-7

indicate that the outside deer herd migration corridor does not extend over the project site.” Further, “the El Dorado County General Plan does not identify the project site as an Important Biological Corridor.” The fact that deer have been currently using the vacant parcels in this area demonstrates that the evidence the initial study is based on is insufficient and out of date. (The deer have clearly not read these reports on where they are supposed to be.) Absent mitigation, the project could have a significant adverse impact on habitat and species. Impacts could include:

- direct mortality to individual deer and other species from construction activities on the site if it is occupied. This is a particular concern for deer during the fawning season.
- indirect mortality to individual deer from removal of migration corridors, which may lead to greater use of roadways to reach suitable habitat area; and
- Loss of wildlife species presence from the neighborhood due to loss of habitat.

Today, as I was driving home along Wilkinson and Estepa, just down the hill from the project site, I saw a coyote sniffing around the area where the deer have been present, which indicates additional use of the wildlife corridors on the project site and adjacent parcels by wildlife (Attachment 3).

The loss of wildlife species also leads to an adverse aesthetic effect, because the presence of a variety of wildlife species in this area of Cameron Park is an important and valuable visual resource. The County’s own Integrated Natural Resources Management Plan Phase 1/Wildlife Movement and Corridors Report recognizes the importance of wildlife in El Dorado County. “Maintaining connectivity and sufficient habitat area for wildlife will help to ensure the continuation of the County’s natural legacy for current and future generations and will meet General Plan goals for conserving biodiversity.” (Report, p. ES-1.)

Furthermore, in light of other development currently occurring in nearby areas, such as the development projects along Bass Lake Road, this project, when combined with the other projects, will result in a loss of chaparral habitat and wildlife movement opportunities that is cumulatively considerable absent mitigation.

Mitigation Measures to Reduce Biological Resources Impacts

Again, I support infill development, but I am very concerned that subdivision and development of these two parcels, absent mitigation, will harm not just deer, but the multiple species that use the project site. The County should acknowledge the rich habitat that the project site provides and the risk to deer and other species that use the site, and then apply mitigation measures that will address the adverse impacts of habitat loss, effects on species, and loss of a wildlife movement corridor. Some options include:

- Condition the tentative map on inclusion of a permanent wildlife corridor easement that maintains existing chaparral habitat, to allow permeability between Woodleigh and parcels along Hillcrest. This area of Cameron Park already has numerous drainage easements that capture surface drainage and route it down the hill to drain into Cameron Park lake. These drainages (provided they remain unfenced), provide for wildlife movement in the neighborhood.

- Condition the tentative map on allowing site clearing to proceed only after confirming that there is no wildlife that will be injured or killed. The site should be assessed for the species identified above, including rabbits that may be underground.
- Condition the tentative map on requiring signage on Woodleigh, Hillcrest, and Estepa to alert drivers to watch for deer.

The Planning Commission should have before it a mitigated negative declaration, not a negative declaration. It is important that the Planning Commission have all the facts and be fully informed before making a decision about whether to approve this project.

Thank you for the opportunity to submit these comments.

Danae Aitchison
djaitchison@comcast.net
3161 Granada Drive, Cameron Park

Attachments

- 1 Aerial view of project site and adjacent parcels
- 2 Photographs of the project site showing dense chaparral habitat
- 3 Photographs of deer, deer trails, and coyote

Attachment 2



Attachment 2



Attachment 3



Male and female deer - June 5, 2019
down the hill from the project site, at Wilkinson and Estepa



Female with fawn – July 5, 2019
down the hill from the project site, at Wilkinson and Estepa

Attachment 3



Wildlife/deer trail on vacant parcel below project site on southeast side
Of Wilkinson, on parcel adjacent to project site

Attachment 3



Wildlife/deer trail on vacant parcel below project site on northwest side Of Wilkinson, bordered by Wilkinson and Estepa, which connects to wildlife/deer trail in above photo

Attachment 3



Coyote sighted on 07/11/19 at site where deer were seen earlier, just down the hill and across Wilkinson from the project site