



March 8, 2024

Mayor Dan Slater

City of Orange

300 E Chapman Ave

Orange, CA 92866

Re: Request for New Environmental Impact Report for Orange Heights Project (Previously Santiago Hills II)

Dear Mayor Slater:

The Orange County Chapter, California Native Plant Society (OCCNPS) respectfully requests that the City of Orange require a new Environmental Impact Report (EIR) for the proposed Orange Heights development project (previously known as Santiago Hills II). While a Supplemental Environmental Impact Report (SEIR 1278) was completed in 2005, significant changes have occurred since then, rendering the existing document inadequate to assess the project's current environmental impacts.

Rationale for a New EIR:

- **Habitat Loss and Sensitive Species:** The 2005 SEIR estimated 163 acres of undisturbed coastal sage scrub would be impacted by the project, with a total project area of 496 acres. This valuable habitat type supports a diverse range of species and the project area hosts the threatened coastal California gnatcatcher, two CNPS Rank 1B species (*Dudleya multicaulis* and *Calochortus weedii* var. *intermedius*), a CNPS Rank 4 species (*Calochortus catalinae*), and others. The SEIR's proposed mitigation measures and pilot project, specifically translocating *Dudleya multicaulis*, should be reassessed to ensure the long term efficacy of these measures. Additionally, many species within the coastal sage scrub community continue to face significant threats from development, with 36% of *Dudleya multicaulis* and 21% of *Calochortus weedii* var. *intermedius* populations currently threatened by development alone. A new EIR must comprehensively assess the current state of these species and explore more effective mitigation strategies.
- **Increased Fire Threat:** Since 2005, California has experienced 15 of its 20 most destructive wildfires and 17 of its 20 largest wildfires. Five wildfires exceeding 5,000 acres have burned within or near the project area, with the largest burning 28,517 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 has grown by over 7% since 2005. This, coupled with increased traffic, necessitates a reassessment of the project's potential impacts on local habitat, infrastructure, air quality, and noise pollution. The 2005 SEIR's analysis is outdated and insufficient to address these current concerns.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 2005 SEIR necessitate a new EIR for the Orange Heights 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 City 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