Puente Hills
Habitat Preservation Authority
Endowment Provided by the Puente Hills Landfill

HABITAT AUTHORITY
CELEBRATING 20 Years
Preservation, Restoration, and Education

March 12, 2014

County of Los Angeles
Department of Regional Planning
General Plan Development Section
Attn: Connie Chung, Supervising Regional Planner
Attn: Susan Tae, Supervising Regional Planner
320 West Temple Street
Los Angeles, CA 90012

Comments on Revised Draft Los Angeles County General Plan 2035 (rev. 1/2014)

Dear Ms. Chung and Ms. Tae:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the revised draft General Plan dated January 2014. On previous General Plan drafts, we provided comment letters dated 08/29/2007, 01/22/2009, 09/08/2011, 07/26/2012, and 11/7/2013. Comments that were not incorporated but that the Habitat Authority believes still apply are reiterated here.

The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq*. with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to its mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency endeavors to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority owns and or manages over 3,800 acres which lie within the Cities of Whittier and La Habra Heights, as well as in the County unincorporated areas of the Puente Hills known as Hacienda Heights and Rowland Heights.

Part II. Planning Areas Framework

Chapter 5. II. Planning Areas Descriptions

1. In Table 5.1 on page 27, various Opportunity Area Types are listed as areas to be considered when preparing community-based plans. Please consider adding a type for Open Space .

2. It is assumed that on page 35 under Geography, "The San Gabriel River runs along the Interstate-610…." should be "The San Gabriel River runs along the Interstate-605….".

Part III: General Plan Elements

Chapter 7: Mobility Element

3. On page 102, Section 5. Impacts of Transportation on Natural and Community Resources -The Habitat Authority recommends a discussion on how changes in transportation can influence accessibility of open spaces (i.e. greater access) leading to an increase in the number of visitors and potentially affecting biological resources.

Chapter 9: Conservation and Natural Resources Element

4. Policy C/NR 1.2 states "Protect and conserve natural resources, natural areas, and open spaces on park properties." It is unclear why this would only pertain to "…park properties." We believe it is the intent of the Policy to cover all natural resources, natural areas, open space, and potential park properties in unincorporated LA County. Therefore, please consider adding following in italics and deleting the strikethrough: *"Protect and conserve natural resources, natural areas, and open spaces* ~~on park properties~~*."*

5. Regarding Policy C/NR 1.5: "Increase and improve access to dedicated open space and natural areas for all users." The County works with numerous land owners (see Appendix E) who own/manage open space within the jurisdiction of this General Plan. Since the County cannot control access to land that they don't own/manage, please clarify by adding the following italicized language. "Increase and improve access to dedicated open space and natural areas for all users *as determined appropriate by each land management agency*."

6. Policy C/NR 1.6 states "Prioritize open space acquisitions for available lands that contain unique ecological features, streams, watersheds, woodlands, grasslands, and/or offer linkages that enhance wildlife movements and genetic diversity." However there are numerous other important habitat types besides woodlands and grasslands that support important natural resources. Therefore, please consider amending the sentence as noted in italics with deletions in strikethrough: "Prioritize open space acquisitions for available lands that contain unique ecological features, streams, watersheds, ~~woodlands, grasslands,~~ *habitat types* and/or offer linkages that enhance wildlife movements and genetic diversity."

7. Regarding Policy C/NR 2.4 to "Collaborate with public, non-profit, and private organizations to acquire and preserve available open space lands.", please consider adding the following language in italics to include the acquisition of land in different land use categories that could be converted to open space: "Collaborate with public, non-profit, and private organizations to acquire and preserve available open space lands *or other lands that could be converted to open space*."

8. On page 128, 2nd paragraph, the Habitat Authority recommends that language be added into the SEA Ordinance allowing public land preservation agencies with adopted management plans to carry out all activities that contribute to the management of the land for preservation, access and safety.

9. On page 130, Policy C/NR 3.9 outlines design considerations for projects proposed in SEAs. The Habitat Authority recommends inclusion of a requirement that such projects retain a contiguous area of undisturbed open space over the most sensitive natural resources to maintain regional connectivity within the undeveloped area, and to preserve these areas in perpetuity through a recorded fee simple dedication to an open space park agency currently operating and/or based in the project area prior to the issuance of any permits.

10. Regarding Policy C/NR 7.2 to "Support the preservation, restoration and strategic acquisition of open space to preserve natural streams, drainage paths, wetlands, and rivers, which are necessary for the healthy function of watersheds.", the acquisition of land types, other than open space, could converted to open space for the protection of those resources. Therefore, please consider adding the following language in italics: "Support the preservation, restoration and strategic acquisition of open space, *and other land types that could be converted to open space,* to preserve natural streams, drainage paths, wetlands, and rivers, which are necessary for the healthy function of watersheds."

11. In Section IV Goals and Policies, Policy P/R 1.9 is to "offer more lighted playing fields using energy efficient light fixtures where appropriate to extend playing time." Please consider implementing spill light limits on ballfields that are adjacent to open space. We suggest the following: "All lighting shall be designed and shielded with the intent of preventing spillage of light into adjacent open space areas. All lighting shall be constructed so that all light emitted by the fixture, either directly from the lamp or from a diffusing element, or indirectly by reflection or refraction from any part of the luminaire, is projected away from the open space as determined by photometric test or certified by the manufacturer."

Appendix E: Conservation and Natural Resources Element Resources

12. On page 40-41, regarding the summary of the Puente Hills SEA, it notes that "significant wildlife movement throughout the Puente Hills SEA has been documented in a two year carnivore study commissioned by the Santa Monica Mountains Conservancy as part of a multi-jurisdictional effort to establish a region wide wildlife movement linkage." Please

update this statement to acknowledge numerous additional wildlife movement studies that have been conducted in this SEA on the Puente Hills Preserve, including several studies of both the Harbor Boulevard Wildlife Underpass and the Colima Road Underpass, all of which are available on the Habitat Authority's website (www.habitatauthority.org/publications).

13. Due to an agency name change, on page 44 (and throughout document), change "California Department of Fish and Game (CDFG)" to "California Department of Fish and Wildlife (CDFW)".

14. The Regional Habitat Linkages section in Appendix E (Conservation and Natural Resources Element) states on page 40 that "critical biological resources are maintained through habitat connectivity, which sustains population genetic diversity, and provides refuge for migrant species". In addition, the Significant Ecological Areas section of Appendix E (page 44) states that one of the two primary conservation principles on which the SEAs are designated is that "isolated habitat areas have less opportunity to regain species by re-colonization from other areas" and that "The SEAs are designed to provide habitat linkages between related habitat types…by encompassing areas of sufficient width to function as wildlife movement routes between these open space areas".

    Please consider revising the SEA selection criteria to directly acknowledge the importance of habitat connectivity and wildlife movement corridors on pages 44-46. It is clear from the language in the Draft General Plan Appendix E, that wildlife movement corridors and habitat connectivity are critical to the concept of SEAs. However, the SEA selection criteria do not mention wildlife movement, corridors, or habitat connectivity[1]. The only criterion that can be construed as being related is criterion D: "Habitat that at some point in the life cycle of a species or a group of species, serves as concentrated breeding, feeding, resting, or migratory grounds, and is limited in availability either regionally or in Los Angeles County". Please consider revising the SEA selection criteria to include lands that provide habitat connectivity and wildlife movement corridors and opportunities, as consistent with the Draft General Plan in Appendix E. The maintenance of wildlife populations in western portions of the Puente-Chino Hills, such as in the Habitat Authority's Preserve, are critically dependent on the movement of individuals from locations further east in the Corridor, and a reduction of this potential movement may pose a serious threat to the persistence of these populations in the future[2].

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[1] PCR. 2000. Los Angeles County Significant Ecological Area Update Study 2000: Background Report. Prepared for: Los Angeles County Department of Regional Planning. November 2000.
[2] Conservation Biology Institute. 2005. Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor. July 2005.

The following comments are regarding the description of the Puente Hills SEA, beginning on page 136:

15. On page 138, fourth paragraph, please note in the text that Sycamore Canyon also supports coastal cactus wrens.

16. On page 139, first paragraph, please add language that describes the habitat in Arroyo San Miguel as coastal sage scrub, chaparral, grassland and riparian and supporting a population of federally-threatened coastal California gnatcatcher.

17. Please note that as of August 15, 2011, due to an amendment of the Habitat Authority's Joint Powers Authority Agreement, the official agency name changed to Puente Hills Habitat Preservation Authority (PHHPA). Please use this name when referring to the agency in future documents and correspondence. On page 139, the last paragraph still references the old agency name. Please check the document for other instances.

18. The open space of the Puente Hills between Harbor Blvd. and State Route 57 has been previously shown to be of great conservation concern to the entire Puente-Chino Hills corridor, both for its value in linking the west and east corridor as well as because of its intrinsic value in supporting significant populations of sensitive animal species.

Comments on Community Climate Action Plan

Based on review of the Community Climate Action Plan, the Habitat Authority respectfully submits the following comments:

1. Page 5-6, Table 5-1, Land Conservation and Tree Planting – Protect Conservation Areas: Please consider not only the evaluation of the Oak Woodland Conservation Management Plan for the preservation of existing oak woodlands but preserving all other native habitats as well. There are numerous native habitats within Los Angeles County that provide important habitat for a suite of species including those protected by law such as the federally threatened California Gnatcatcher, *Polioptila californica*, that depends on coastal sage scrub habitat and the California State Species of Special Concern Coastal Cactus Wren, *Campylorhynchus brunneicapillus*, that nests almost exclusively in prickly pear (*Opuntia littoralis* and *O. oricola*) and coastal cholla (*O. prolifera)*, within coastal sage scrub habitat, to name a few. In addition, the California endemic Southern California black walnut (*Juglans californica* var. *californica*) is severely threatened by ubanization and is considered by The Nature Conservancy and the state of California to be one of California's "rare and imperiled natural communities" (http://www.fs.fed.us/database/feis/plants/tree/jugcal/all.html). The Chino-Puente Hills is a major center of distribution for this species and is one of the dominant woodland community tree species in the Puente Hills Preserve. Therefore, please consider revising the Initial Implementation Step in Protecting Conservation Areas to include a complete review of all native communities.

2. Page C-20 , LC-2 Create New Vegetated Open Space – Additional Information:
   This section currently states that "New vegetated open spaces should be designed and maintained to minimize the spread of invasive species." Please considering adding language to encourage the use of drought-tolerant native plantings in all revegetation projects since this can contribute to decreasing water consumption.

3. Page C-20, LC-4 Protect Conservation Areas – Action Status:
   The *Additional Information* (page C21) acknowledges that open spaces can sequester atmospheric CO_2 creating a sink of carbon and thus having Greenhouse Gas (GHG) benefits. However, the Plan currently states that "GHG emissions reductions have not been quantified or counted toward attainment of the County's CCAP target." Therefore to acknowledge the contribution of open spaces as carbon sinks, the Habitat Authority recommends conducting a quantifiable analysis of open space area contributions to atmospheric CO_2 sequestration.

4. Page C-21, LC-4 Protect Conservation Areas – Approaches:
   To support the Action Goal of "Encourage the protection of existing land conservation areas" please consider the preservation of other native habitats besides oak woodlands (see detailed info in comment 1).

We appreciate the opportunity to comment on the General Plan and CCAP documents. Please notify us when the Habitat Conservation Plan, Mitigation Land Banking Program, Trails Master Plan, Open Space Land Acquisition Strategy, and Oak Woodland Conservation Management Plan, documents are available for public review.

Thank you for your consideration of our comments. Feel free to contact me or Lizette Longacre, Ecologist, at (562) 945-9003 for further discussion.

Sincerely,

Bob Henderson
Chairman

cc: Board of Directors
Citizens Technical Advisory Committee