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

January 24, 2013

Brianna Menke
Department of Regional Planning
320 W. Temple Street, Room 1354
Los Angeles, CA 90012
bmenke@planning.lacounty.gov

Re: Draft Hillside Management Area (HMA) Ordinance

Dear Ms. Menke:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the Draft Hillside Management Area (HMA) Ordinance for the unincorporated areas of Los Angeles County dated December 6, 2012.

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.

The following comments are submitted for your consideration:

1. Section 22.56.215 B, page 2 – Please consider applying this ordinance to single-family residences (SFRs), as their development may have impacts to the natural resources by changing the natural grades or slopes, or by generating runoff on to protected open space. Including SFRs would be consistent with the intent of the CA Environmental Quality Act

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which aims to protect natural resources and slopes in part by not exempting SFR developments if they are within an area of local, state or federally mapped resources (CEQA Guidelines 15300.2).

2. Section 22.56.215 D.1.b, page 6 – The association of the listed uses allowed in Open Space areas could be considered to dilute the intention of the Ordinance to preserve natural open space. Please consider limiting the list to exclude elements containing impervious surfaces and permanent irrigation, or that alter natural vegetation, beyond that caused by recreational trails. Examples of these would be high-activity parks and brush clearance. High-activity parks, while in some cases acting as a buffer to natural open space, also could cause edge effects associated with concentrated human use of an area including night lighting, trash or ornamental plants which could attract wildlife, fertilizers, and irrigation which bring invasive species such as the Argentine ant into natural areas. All brush clearance and fire safety areas should be incorporated into the development project footprint since it is conducted for and directly benefits the safety of the development and will need to be regularly maintained.

3. Section 22.56.215 D.1.c.iv, page 7 – Please consider changing the language to require a 100-foot buffer not 50-foot buffer from the edge of natural watercourses consistent with the Los Angeles County Malibu Land Use Plan and the Draft Santa Monica Mountains Coastal Zone Community Standards District documents. In those documents 100 feet is the minimum distance required to prevent negative impacts such as runoff from affecting the watercourse.

4. Section 22.56.215 D.1.f.ii, page 8 – Please consider requiring that dedication of open space to a nonprofit land conservation organization not only meet the Statement of Qualifications of Non-Profits Requesting to Hold Mitigation Land according to CA Government Code Section 65965, but that they also have proven capabilities and relevant experience to manage the land.

5. Section 22.56.215 D.2.b, page 9 – Please consider changing the requirement to locate development on the flattest portions of the site *only* if that area is not concentrated with rare, sensitive, or State or federally listed species.

6. Section 22.56.215 D.4.d, page 11 - The Draft Ordinance requires streets to be at the edge of development to act as a buffer between development and open space. It is unclear whether the Ordinance is referring to dedicated open space as a result of the development or already existing protected open space. Whenever possible it is best to buffer developments that are next to the Authority's Preserve with dedicated natural undeveloped open space from the project. Installing streets between the project development and the dedicated open space from the project in some cases could be beneficial if there is a control on eliminating parking and preventing stopping of vehicles,

as well as including a fencing element to prevent illegal access, dumping and arson. The fence should be required only if there is not an impact to the natural resources such as wildlife movement.

Thank you for your consideration of our comments. Feel free to contact me or Andrea Gullo, Executive Director, at (562) 945-9003 for further discussion.

Sincerely,

Bob Henderson
Chairman

C: Board of Directors
Citizens Technical Advisory Committee