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

February 3, 2014

County of Los Angeles
Department of Regional Planning
Attn: Emma Howard
Regional Planning Department
Room 1354
320 W. Temple Street
Los Angeles, CA 90012

Comments on the Draft Significant Ecological Area Ordinance dated December 5, 2013
Comments on the Preliminary Draft Significant Ecological Area Program Guide dated 2013
Comments on the SEA Developed Area and SEA Boundary maps

Dear Ms. Howard:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the Draft Significant Ecological Area (SEA) Ordinance (dated December 5, 2013). 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 Habitat Authority thanks and acknowledges the Department of Regional Planning for the incorporation of certain comments on the previous SEA Ordinance Summary Draft dated June 2012, and December 20, 2012. These comments included suggested language for development standards within SEAs, such as exclusion of invasive plants, fencing to promote wildlife movement, and avoidance of habitat impacts from fuel modification. However, certain comments were not addressed in the current Draft Ordinance and are included below for reference, along with additional comments.

A Joint Powers Agency created pursuant to California Government Code §6500 *et seq.*
7702 Washington Avenue, Suite C, Whittier, California 90602 • Phone: 562 / 945-9003 • Fax: 562 / 945-0303

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SEA ORDINANCE

Section 2 - 22.08.190

The definition of an SEA has been removed and now states that an SEA "means: any portion of a lot or parcel of land identified as a Significant Ecological Area on the Significant Ecological Areas and Coastal Resource Areas Policy Map of the General Plan". The latest draft (Jan 2014) of the General Plan describes an SEA but it is difficult to locate under Appendix E (not in Appendix C like Section 22.52.2905 subsection "O" of the Ordinance mentions). To alleviate any misunderstandings as to what constitutes an SEA and to make the definition easy to find and understand, please consider adding the definition of an SEA to section 22.52.2905 of the SEA Ordinance.

Section 22.52.2905 – Definitions

Definition A. "Connectivity Area" and Definition B. "Constriction Area" – Both definitions include the phrases "large undisturbed areas". Please define what constitutes "large" since this can be interpreted in varying ways.

The definition of "Ecological Transition Area" has been removed and is no longer mentioned in the SEA Ordinance. It is referenced once in the General Plan on page 382. If this term is no longer used, please be sure it is removed from all documents. However, if it is still being used, add the definition back into this section.

Definition O. "SEA Description" – This definition states that "SEA Description means the description of species populations and SEA Habitat Types within each SEA provided in the General Plan (Appendix C)". However, the description seems to be located in Appendix E. Please double check the location of the "SEA Description". There is a good description of an SEA in the *Preliminary Draft Significant Ecological Areas Program Guide* that could be used.

Definition P. "SEA Development Map" – According to this definition, the development map also depicts Habitat Preservation Areas and other Natural Open Space Areas. However, only the red proposed- developed areas are showing up on the GIS-NET3 "SEA Proposed-Developed Areas" layer. If Natural Open Space areas are to show up, then the Puente Hills Preserve should be highlighted.

Based on the comment under Section 2 (22.08.190), please consider adding a general definition of an SEA to this section of the SEA Ordinance.

It is suggested to add a definition of "Site plan review" since SEA conditional permits A and B are described.

Section 22.52.2910 - Applicability

Subsection C.1.We understand that projects outside of SEAs are not subject to this Ordinance, however, please consider that for projects immediately adjacent to SEAs that they be reviewed by the County Biologist for compatibility. Just as the Fire Department, Parks, and other County departments review projects prior to approval, so to would the County Biologist in these instances, and would check the project for compatibility issues associated with noise, lighting, runoff, etc.

Subsection C.2 and C.3. We recommend that this standard also consider any cumulative effects from other nearby projects that may have not been approved when the original permit was approved but which could now have a cumulatively negative impact on biological resources within the SEA.

Subsection C.6. It is recommended that the SEA Ordinance apply to new projects undertaken by public utilities that may directly or indirectly (such as lighting for a new tower on top of an existing structure or adding height beyond 200 feet to an existing structure) affect habitat.

Subsection C.7. The exemption from the SEA Ordinance noted in Subsection C.7. is for "any of the following activities required, requested, authorized or permitted by a governmental agency: (a) Removal or thinning of vegetation for fire safety or in response to an emergency; and (b) Hazard management activities in response to an emergency or other public safety concerns." We suggest that activities involving removal of non-native vegetation (including by herbicide) and habitat restoration (including, but not limited to, seeding, planting of container plants, and irrigation) also be exempted activities by open space management government agencies. We also suggest exemption of government agency activities such as scientific studies, erosion control, and construction, maintenance or demolition of trails, structures or facilities necessary for open space management activities.

Section 22.52.2915–Permitted Uses

Subsection A.2 This subsection allows for uses or projects located within developed areas identified in the SEA Development Map. However, based upon a review of the Proposed Developed Areas available through the Department's GIS-NET3, many of these mapped areas in the proposed Puente Hills SEA appear to be incorrect. Some existing fuel modification zones are mapped, and others are missing. Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas that are identified as developed that are on Habitat Authority properties. Since the Habitat Authority will not be allowing expansion of development activities within fuel modification zones on lands managed/owned, this layer on the map needs to be adjusted. See attached comments. In addition, the Authority's and County's trails are not identified as developed. The Habitat Authority would be happy to share its trails GIS layer, and to work with the Department to create an accurate map of the developed areas and trails.

Subsection A.4 and A.5 This allows for expired projects that are deemed fundamentally similar to the previous authorization and for modifications to previously approved projects. We suggest that these projects prohibit the removal of any native habitat that may have developed or recovered on or adjacent to the site, and consider protection of any sensitive species or important wildlife movement corridors that may have since been identified. In addition, we recommend that this standard also consider any cumulative effects from other nearby projects that may have not been approved when the original permit was approved but which could now have a cumulatively negative impact on biological resources within the SEA.

Subsection A.6 This allows for activities conducted by governmental agencies to improve the quality of biological resources in an SEA, including non-native vegetation removal programs, native habitat restoration programs, and construction of wildlife under and overpasses for habitat linkages and wildlife corridors. It was requested earlier in this letter and in previous letters that such activities be exempt and we still make that recommendation, as they are conducted for the sole benefit of

habitat improvement and generally have very minor impacts. However, if they remain as Permitted Uses requiring Site Plan Review, it is our understanding that such review would only apply to new or existing programs, and would not be required for every individual project, some of which are quite small and isolated. For example, the Habitat Authority has an existing Resource Management Plan (RMP) which includes non-native vegetation removal and habitat restoration programs; it is our understanding that the RMP could be submitted for Site Plan Review and approval, and that any subsequent activities consistent with that RMP would be permitted without individual site plan review. This would include , that activities such as scientific studies, erosion control, and construction, maintenance or demolition of trails, structures or facilities necessary for open space management activities be exempt as requested earlier in this letter and in previous letters; If these activities are not exempt then the intent of the Ordinance may be defeated by the abundance of County staff resources necessary to follow up and make site visits that would be required per this proposed Ordinance due to the many activities of governmental land management agencies county-wide. These activities described above are integral to the management of biological resources, and often have minor impacts compared to other permitted uses such as single-family residences. The requirement for open space management activities (such as non-native vegetation removal or demolition of trails) to undergo a Site Review or Conditional Use Permit process would needlessly cost the County, and land management agencies (which are already struggling with limited resources) additional unanticipated funds which could be used for actual improvement of biological resources and would unnecessarily delay safety, maintenance, and educational management actions on properties enjoyed daily by the public. Please also consider indicating in the ordinance that the Site Plan approval has no term limits.

Subsection C. Surface mining can severely erode the soil, reduce soil fertility, and contribute toward air pollution as well as impact water quality, native vegetation and wildlife. Due to these environmental impacts of surface mining and the irreplaceable biological resources in SEAs, please consider not allowing surface mining activities in SEAs. If surface mining is allowed, please consider limiting the amount and types of surface mining activities that will be considered by the County, describe the means for environmental review, limitations and mitigation.

Section 22.52.2925 - Development Standards

This section lists the development standards non-exempt activities would need to adhere to when conducted within SEAs.

Subsection A.1. This subsection states that "Landscaped area within an SEA shall not include invasive species listed in the Invasive Species List of the SEA Design Manual." Please consider the following revised language (new text in **bold**): "Landscaped areas within an SEA shall not include invasive species listed in the Invasive Species List provided in the SEA Program Guide **or has a California Invasive Plant Council inventory rating of high or moderate**."

Subsection A.2. This subsection notes that "all outdoor lighting shall comply with the standards in Part 9 of Chapter 22.44", which refers to the Rural Outdoor Lighting District. Please add clarifying language indicating that these lighting standards shall apply even if the SEA is not located within the Rural Outdoor Lighting District.

Subsection A.6. This subsection notes that new development may not narrow Connectivity Areas to a width of less than 1,000 feet at any point. Please provide a justification for the minimum width of 1,000 feet.

Subsection A.7. Similarly, new development may not narrow Constriction Areas to a width of less than 200 feet at any point. Please provide a justification for the minimum width of 200 feet.

December 20, 2012 draft Subsection J. This section included requirements for activities that may affect special status species and was excluded from the current draft. Please consider adding the information in Subsection J of the Dec. 20, 2012 draft back into the Ordinance. Also consider the following revised language for clarification (new text in **bold**, deleted text in strikeout): "When any ground disturbance, use, or project may encroach upon a **an individual of or habitat for** a ~~likely to occur~~ species of special status identified in the SEA's Description in the General Plan and/**or** discovered during the biologist site visit required by Section 22.52.2650.B.1, such ground disturbance, use or project shall not impact an area of exceeding ~~50~~**10** percent of the habitat area for the species of special status on the lot or parcel of land." Changes in the first part of the sentence are suggested to clarify that encroachments could occur to individuals or habitat, and that special status species other than those identified in the SEA's Description could be discovered by the biologist. The change in the last part of the sentence, from 50 to 10 percent, represents a more conservative approach and would reduce the threshold for requiring a Conditional Use Permit. Depending on the species or size of the parcel, removal of half of the habitat for a special status species could threaten the viability of a population on that parcel or even within the SEA, and should require additional analysis.

Subsection A.9. This section appears to be missing. The Ordinance goes from Subsection A.8 to A.10.

Subsection A.11c. table. In the table, the setback requirement for "vernal pools, and playas" is 150 feet. To protect the watershed and uplands that provide habitat for amphibians, reptiles and vernal pool plant pollinators, consider increasing the buffer distance to 250 feet as this is the standard setback distance to protect vernal pool species per the U.S. Fish and Wildlife Service.

Finally, we suggest adding an additional standard, which would require that structures be clustered as close as possible to other existing structures and be located as close as possible to existing roads in an effort to reduce fragmentation and edge effects.

Section 22.52.2930 – Conditional Uses

Subsection C. This subsection states that "Any development that is otherwise permitted by Section 22.52.2915.A but would occur at the site of the habitat for an undiscovered or previously thought extinct species, as discovered during the biologist site visit required by Section 22.52.2920.A.2." Please consider the following revised language (new text in **bold**): "Any development that is otherwise permitted by Section 22.52.2915.A but would occur at the site of the habitat for an **observed species of special status** or an undiscovered or previously thought extinct species, as discovered during the biologist site visit required by Section 22.52.2920.A.2…" The proposed language was previously included in the December 20, 2012 draft of the SEA Ordinance.

Section 22.52.2935 –Conditional Uses – Application Procedures

Subsection C. It states that during the biological site visit, "Such site visit shall include identification and delineation of SEA Habitat Types, tree species listed in the SEA Program Guide and Water Resources." Please consider the following revised language (new text in **bold**): "Such site visit shall include identification and delineation of SEA Habitat Types, tree species listed in the SEA Program Guide, Water Resources, and special status species."

Subsection D.1.a. This lists criteria for projects within SEAs that will require a Type B CUP (for higher impact projects, requiring more open space mitigation and review by the SEA Technical Advisory Committee [SEATAC]) instead of a Type A CUP (for lower impact projects). The criterion under (a) is that "the proposed development may create an isolated area of natural habit." Assuming "natural habit" is a typo, please change to "natural habitat". Under ii for the definition of "isolated" please explain how and why the determination of "…is not continguous to at least 30% of the perimeter" was developed.

Section 22.52.2940 –Conditional Uses – Conditions of Approval

Subsection B.1.c.i. This describes open space requirements for Type A CUP conditions of approval, and gives preference to open space preserved on the same lot or parcel as the impact. This preference may not always result in the highest conservation value, especially if the resulting open space is small or isolated. Rather, preference should be given to preserving open space that is contiguous with other preserved lands, or to areas that will create or strengthen a habitat linkage or wildlife corridor. This type of strategic conservation will promote the viability of SEAs more than a piecemeal approach.

Subsection B.2.a. States that no improvements shall be allowed except for any applicable provisions in Section 22.56.215. However, this section refers to the existing Hillside Management and Significant Ecological Areas, and this section does not mention improvements that may be allowed in open space areas within SEAs. Any improvements allowed in required open space areas should be specified in this subsection, and should include (as appropriate) trails, signage, fencing, non-native vegetation removal, habitat restoration, and improvements associated with biological resource monitoring, research and management.

Subsections B.3.a. This section related to subdivision developments. This sections states that required Natural Open Space areas within the subdivision will be recorded on the final map as a "fee lot" or as an Open Space – Restricted Use Area. Please define "fee lot". It is also stated that required Natural Open Space areas will be recorded in the office of the County Recorder on a covenant and agreement. We recommend that required Natural Open Space be recorded as a conservation easement to protect the space in perpetuity.

Subsection B.3.b. This section relates to development that is not a subdivision. It is stated that required Natural Open Space areas will be recorded in the office of the County Recorder on a covenant and agreement. We recommend that required Natural Open Space be recorded as a conservation easement to protect the space in perpetuity.

Subsection B.4 c. In discussing the management of the dedicated open spaces, this section states that if a governmental agency or non-profit land conservation organization is not dedicated to the

management of open space, then "a maintenance agreement shall be established to hold and manage the Natural Open Space under a mandate to protect it in perpetuity." However, it doesn't state who the land manager would be. Please exclude Homeowners associations from managing these open space areas since they often lack the staff or expertise to manage the biological resources as necessary for SEA maintenance. In addition, along with the dedication, funds should be provided that are sufficient for land management in perpetuity.

22.52.2945 - Conditional uses – Review and Hearing Procedures

Subsection A. This states that a Type A CUP will be considered by a Hearing Officer, whereas a Type B CUP will be reviewed by SEATAC and considered by the Regional Planning Commission. Regarding Type A CUP considerations by Hearing Officers, it is our understanding that a Department staff biologist will have already reviewed the submission and made recommendations. Please clarify if this understanding is not correct

Subsection C.3. This subsection lists the Findings required for the Hearing Officer or Regional Planning Commission to issue an SEA CUP. Subsection H.3 requires that a project cannot result in the loss of SEA viability, which is defined as (a) bisecting the SEA, (b) closing of a connectivity or constriction, (c) removing habitat characteristic of the SEA, (d) removing the only known location of an SEA species, or (e) removing the only known location of a new or rediscovered species. Items b, d and e provide a very high threshold for determining the loss of SEA viability. For example, the substantial narrowing of a connectivity area, not just the closing of the constriction, could result in SEA viability loss. Or the removal of key habitats or populations of certain species could, not just the removal of the only known locations of that species, could also result in SEA viability loss. These SEA viability thresholds should be revised to be less limiting.

Appendix for Park 28

Please clarify what classification system is being used for the determination of Habitat Type.

SEA 8. Puente Hills SEA. By using the eight Habitat Types listed in the Ordinance, numerous critical habitat types will not be considered, such as native grasslands and mulefat scrub. The Puente Hills Habitat Preservation Authority has an adopted Resource Management Plan (2007) which describes the vegetation communities within the Puente Hills Preserve (Section 3.0). The RMP can be found at www.habitatauthority.org. It is recommended to use those classifications of vegetation communities.

PRELIMINARY DRAFT SIGNIFICANT ECOLOGICAL AREAS PROGRAM GUIDE

III. Exemptions. The SEA Ordinance exempts safety activities in response to an emergency and uses in areas regulated by Local Coastal Plans. As commented on in the SEA Ordinance section 22.52.2910 subsection C.7, we suggest that activities involving removal of non-native vegetation (including by herbicide) and habitat restoration (including, but not limited to, seeding, planting of container plants, and irrigation) also be exempted activities by open space management government agencies. We also suggest exemption of government agency activities such as scientific studies, erosion control, and construction, maintenance or demolition of trails, structures or facilities necessary for open space management activities.

IV. Development Standards. This section was not available at the time of review. The Habitat Authority looks forward to commenting on this section when it is available.

Streets and Highways. There is good detailed information about the types of wildlife crossings. The Program Guide currently lists 5 recommendations to consider when designing new streets or highways. Please consider stating that these recommendations should be considered when retrofitting streets and highways as well. In addition, please consider adding the following 6th recommendation in bold: **New or improved roads in SEAs, especially those adjacent to open space, should consider wildlife crossing structures.** It is most cost effective to design and install these structures while the new roads are being built or existing roads are being improved.

V. General Recommendations. This section was not available at the time of review. The Habitat Authority looks forward to commenting on this section when it is available.

VI. SEA Specific Recommendations. This section was not available at the time of review. The Habitat Authority looks forward to commenting on this section when it is available.

VII. Biological Reports Requirements.

New section. Please consider adding a section on *Preparer's Qualifications and Certifications* that must be included in the SEA Site Assessment Report (SSAR) and SEA Site Impacts Report (SSIR).

SEA Site Assessment Report Sections 2 and 3. Please consider adding additional information required in those sections. San Luis Obispo County Department of Planning and Building has detailed *Guidelines for Biological Resources Assessments (December 2009)* that could be used as a model; especially the sections on Biological Survey Process, Appendix A sections E, F, and H as well as Appendix B. This Guide can be found at
http://www.slocounty.ca.gov/Assets/PL/environmental/environmentalresources/Guidelines_Bio.pdf

SEA Site Impacts Report Section 3, 4 and 5. Please consider adding additional information required in those sections. San Luis Obispo County Department of Planning and Building has detailed *Guidelines for Biological Resources Assessments (December 2009)* that could be used as a model; especially in Appendix A section G. This Guide can be found at
http://www.slocounty.ca.gov/Assets/PL/environmental/environmentalresources/Guidelines_Bio.pdf

VIII. Invasive Species List.
Please indicate the source for the list of invasive plant species and add that plants given a California Invasive Plant Council inventory rating of high or moderate shall not be planted.

GIS-NET3 MAPS

SEA Proposed-DRAFT- layer
Please amend the proposed SEA boundary as described on the attached maps.

SEA Proposed-Developed Areas- layer
Please amend the developed area polygons as described on the attached maps.

Thank you for your consideration of our comments. We look forward to reviewing the still to come sections of the Program Guide as soon as they are made available. Feel free to contact me or Lizette Longacre, Ecologist, at (562) 945-9003 for further discussion.

Sincerely,

Bob Henderson
Chairman

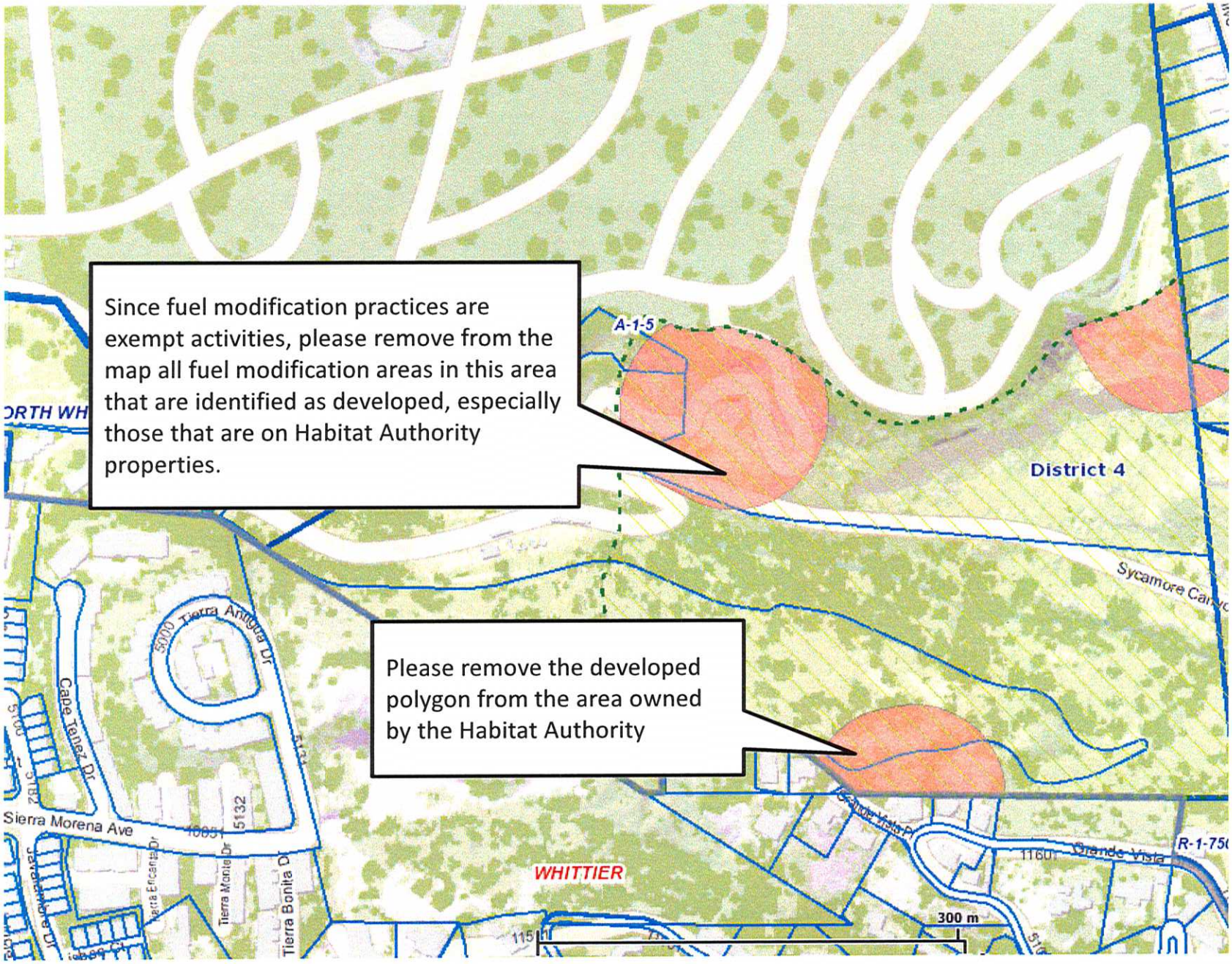
cc: Board of Directors
Citizens Technical Advisory Committee
Mitch Glaser, Los Angeles County Department of Regional Planning

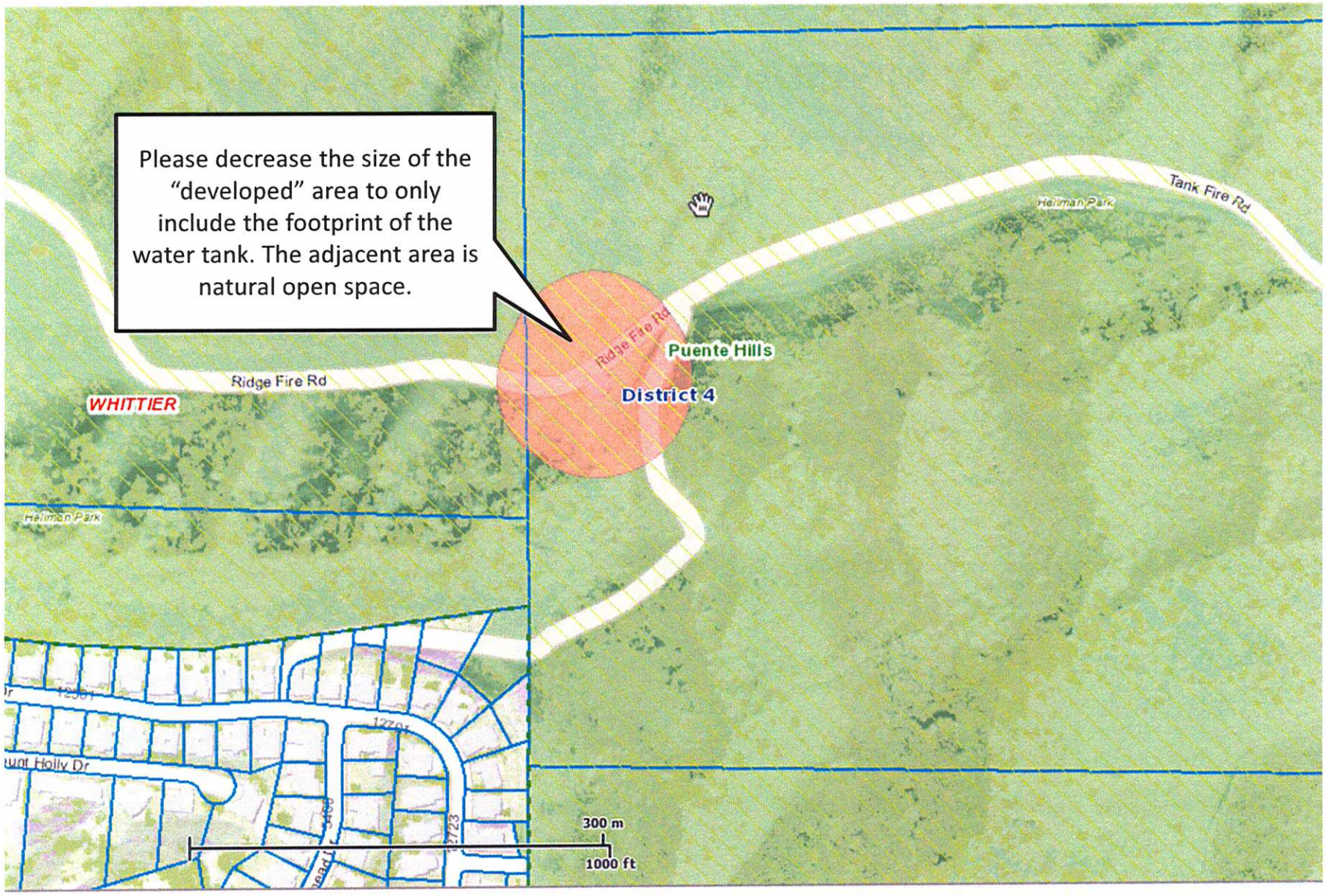
Attached:
Comments on SEA maps

Puente Hills Habitat Preservation Authority

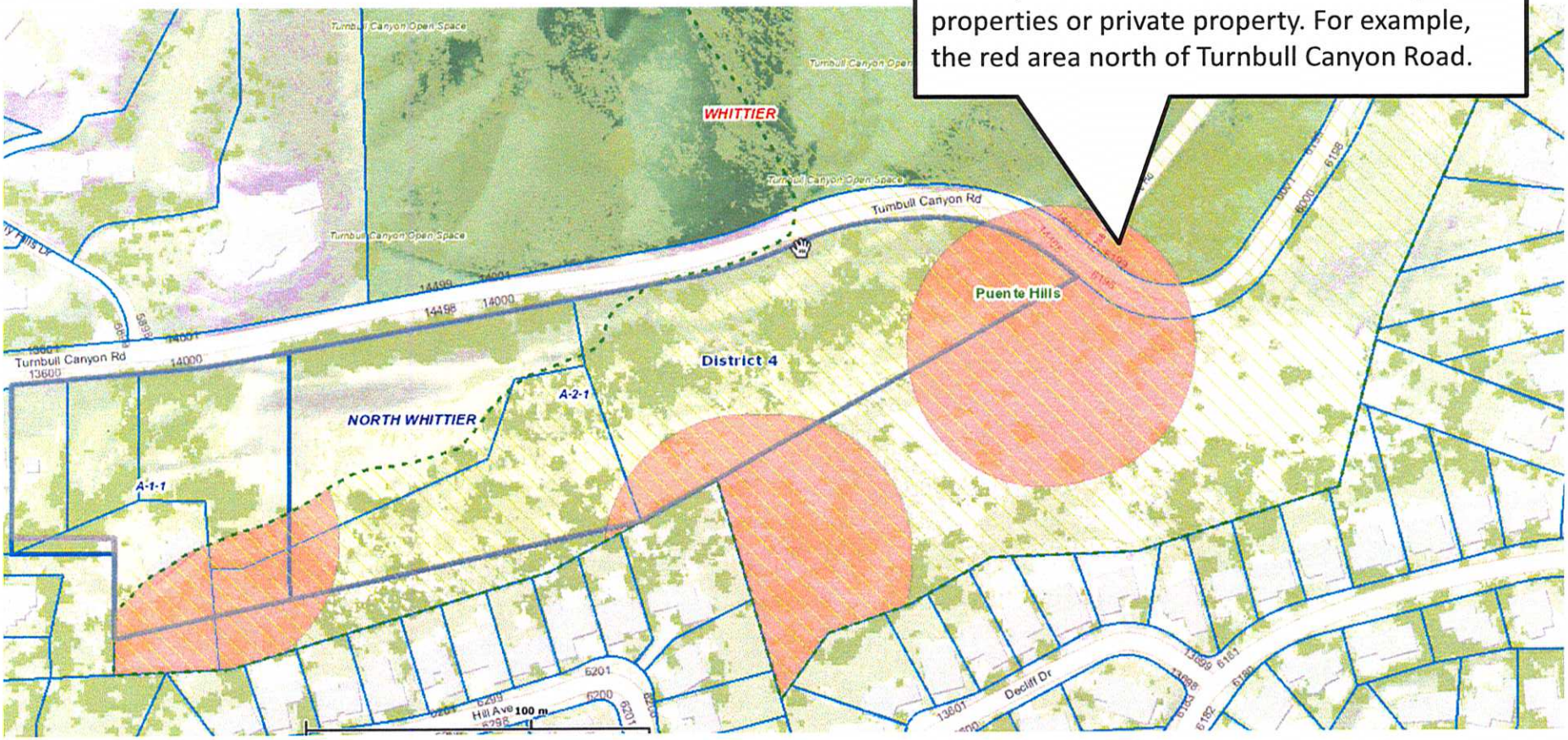
Comments on SEA Developed Area and SEA Boundary maps

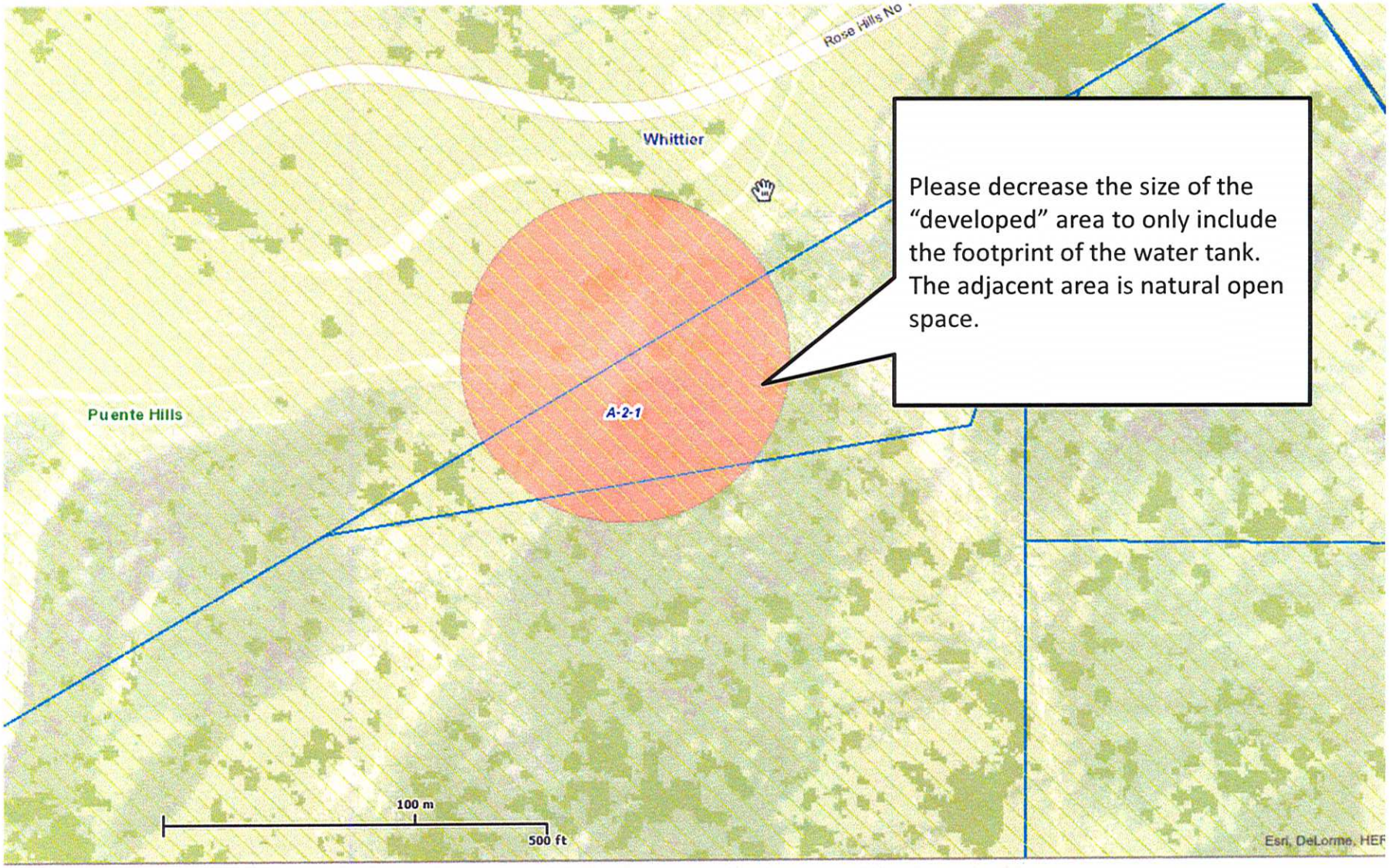
Global comment: Since according to section 22.52.2910 C7a of the SEA Ordinance fuel modification practices are exempt, please remove all developed area bubbles intended to identify fuel modification practices from the map for Habitat Authority owned or managed properties and all private properties. Identifying fuel modification areas as developed areas exposes them to future developments which counteracts the purpose of preserving the surrounding open space from impacts by future additional fuel modification requirements or other impacts from future developments.


Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas in this area that are identified as developed, especially those that are on Habitat Authority properties.
Please remove the developed polygon from the area owned by the Habitat Authority
A-1-5
District 4
Sycamore Canyo
Tierra Antigua Dr
Cape Telnez Dr
Sierra Morena Ave
Tierra Encanta Dr
Tierra Monte Dr
Tierra Bonita Dr
Grande Vista Dr
Grande Vista
R-1-75
WHITTIER
300 m

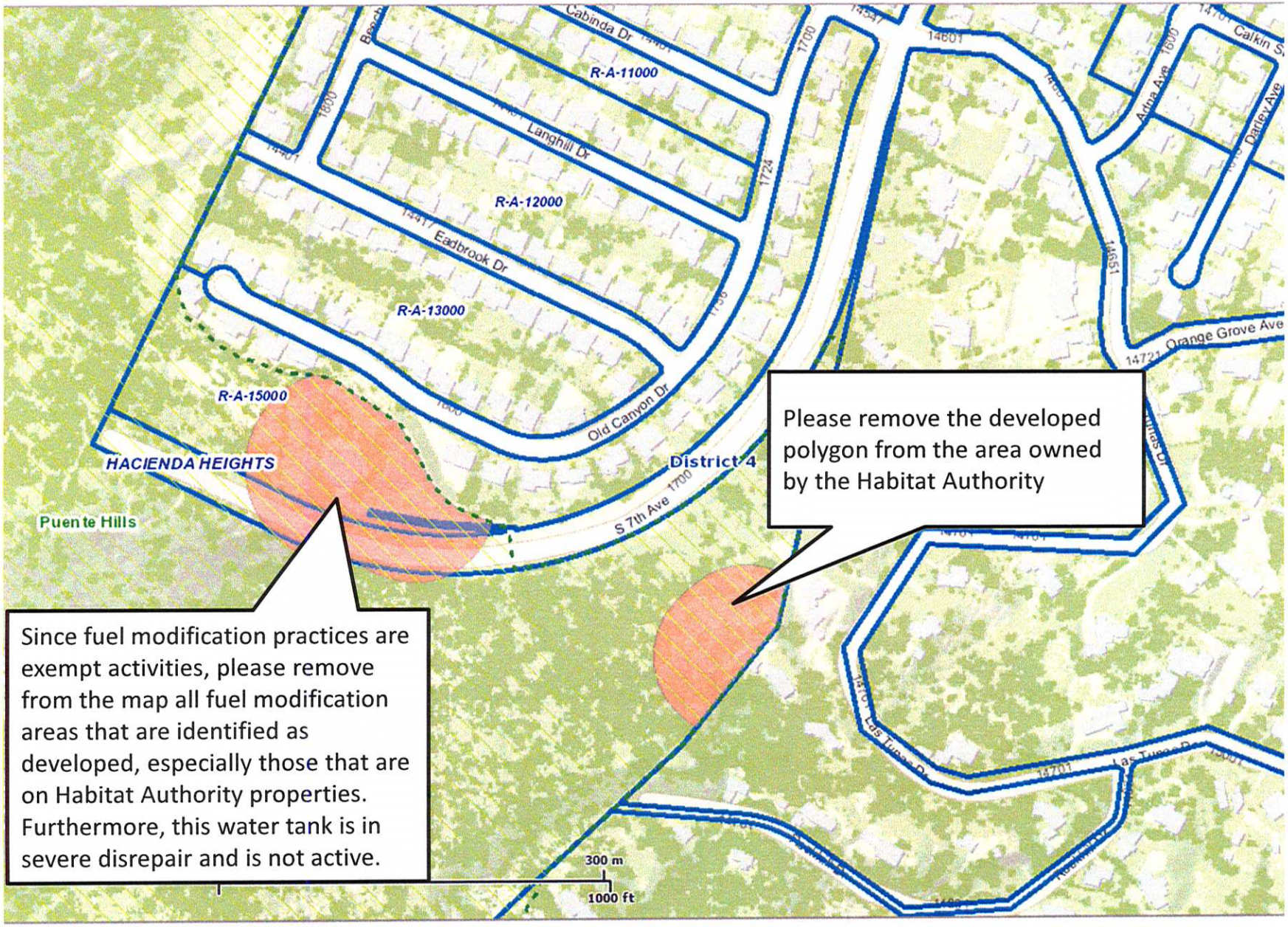

Please decrease the size of the "developed" area to only include the footprint of the water tank. The adjacent area is natural open space.
Ridge Fire Rd
WHITTIER
Ridge Fire Rd
Puente Hills
District 4
Tank Fire Rd
Heilman Park
Heilman Park
300 m
1000 ft

Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas that are identified as developed that are on Habitat Authority properties or private property. For example, the red area north of Turnbull Canyon Road.



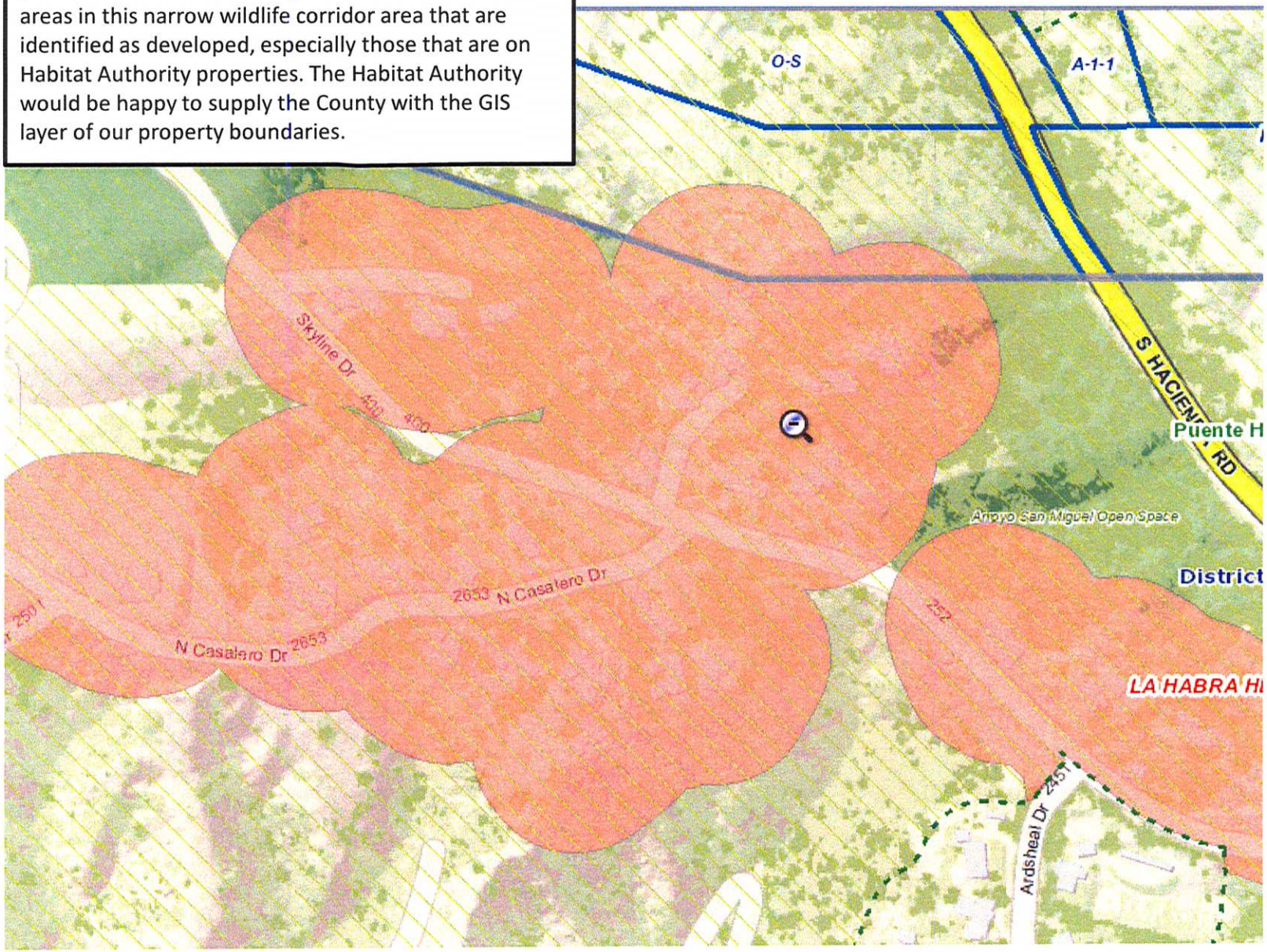


Please decrease the size of the "developed" area to only include the footprint of the water tank. The adjacent area is natural open space.


Cabinda Dr
R-A-11000
Langhill Dr
R-A-12000
Eadbrook Dr
R-A-13000
R-A-15000
Old Canyon Dr
HACIENDA HEIGHTS
Puente Hills
District 4
S 7th Ave
Orange Grove Ave
Calkin St
Adna Ave
Darley Ave
Las Tunas Dr
300 m
1000 ft
Please remove the developed polygon from the area owned by the Habitat Authority
Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas that are identified as developed, especially those that are on Habitat Authority properties. Furthermore, this water tank is in severe disrepair and is not active.

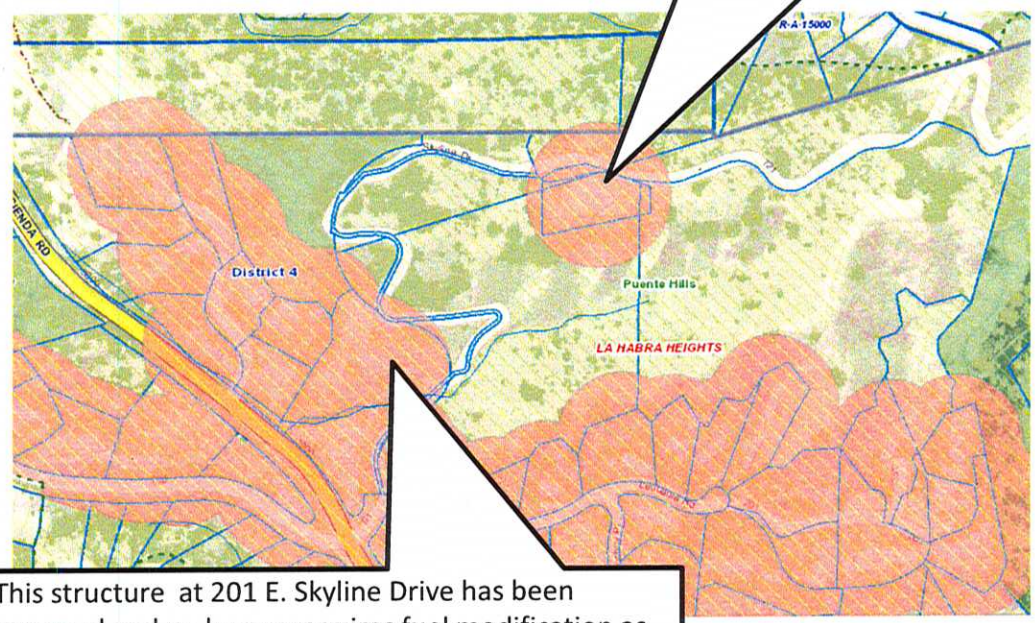
Please remove the developed polygon from the area owned or managed by the Habitat Authority
Please remove the developed polygon from the area owned or managed by the Habitat Authority
Puente Hills
District 4
WHITTIER
Whittier Area Cooperative Special Education Program
Ocean View
14505
14591
8100
Romero Dr
8000
San Lucas Dr
8100
8186
14651
14701
14765
14779
Mar Vista St
14801
14901
14921
Lodosa Dr
15001
8200
300 m
1000 ft
Ave
8100 Cielo V
COLIN

Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas in this narrow wildlife corridor area that are identified as developed, especially those that are on Habitat Authority properties. The Habitat Authority would be happy to supply the County with the GIS layer of our property boundaries.



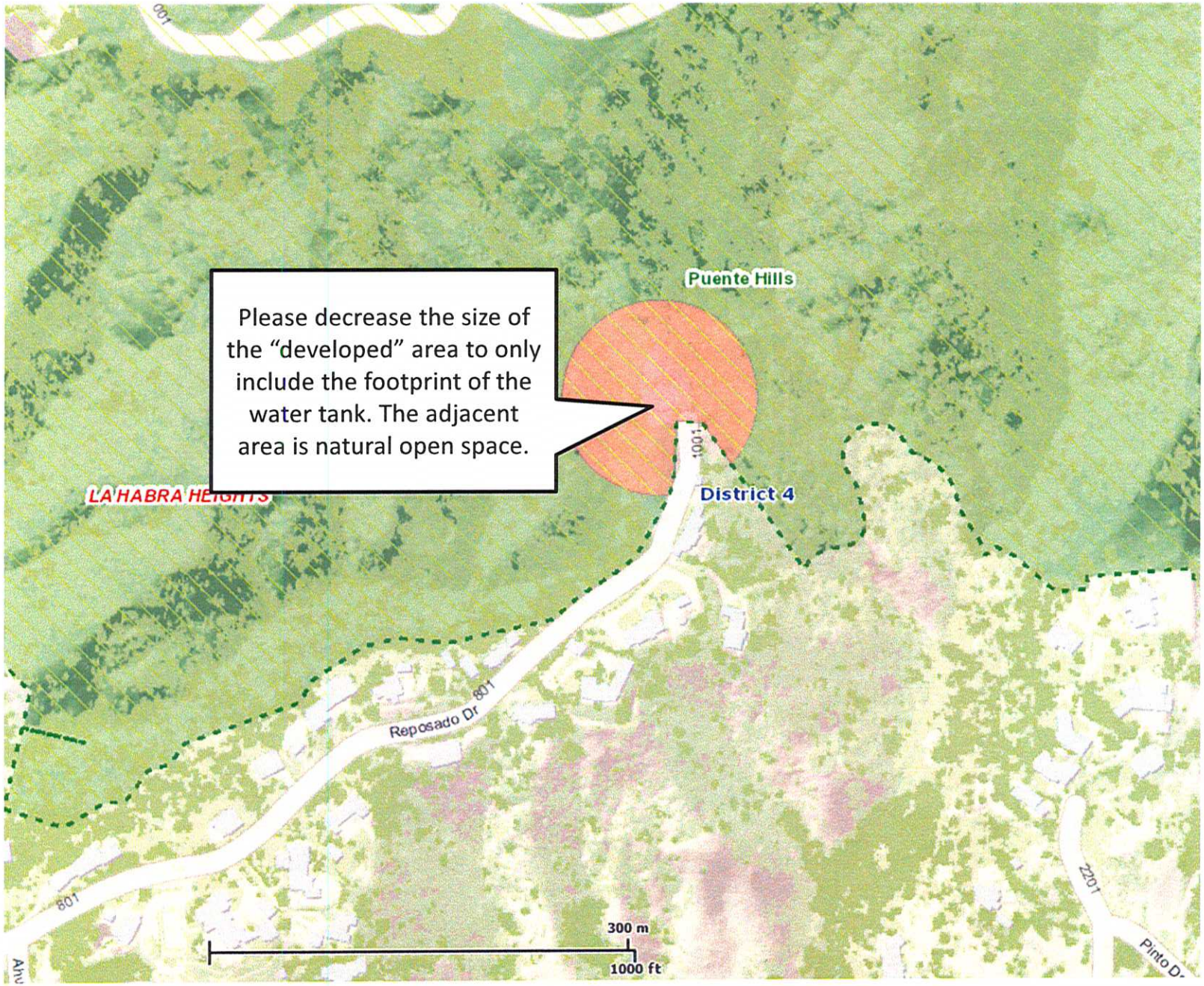
Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas in this narrow wildlife corridor area that are identified as developed, especially those that are on Habitat Authority properties. The Habitat Authority would be happy to supply the County with the GIS layer of our property boundaries.

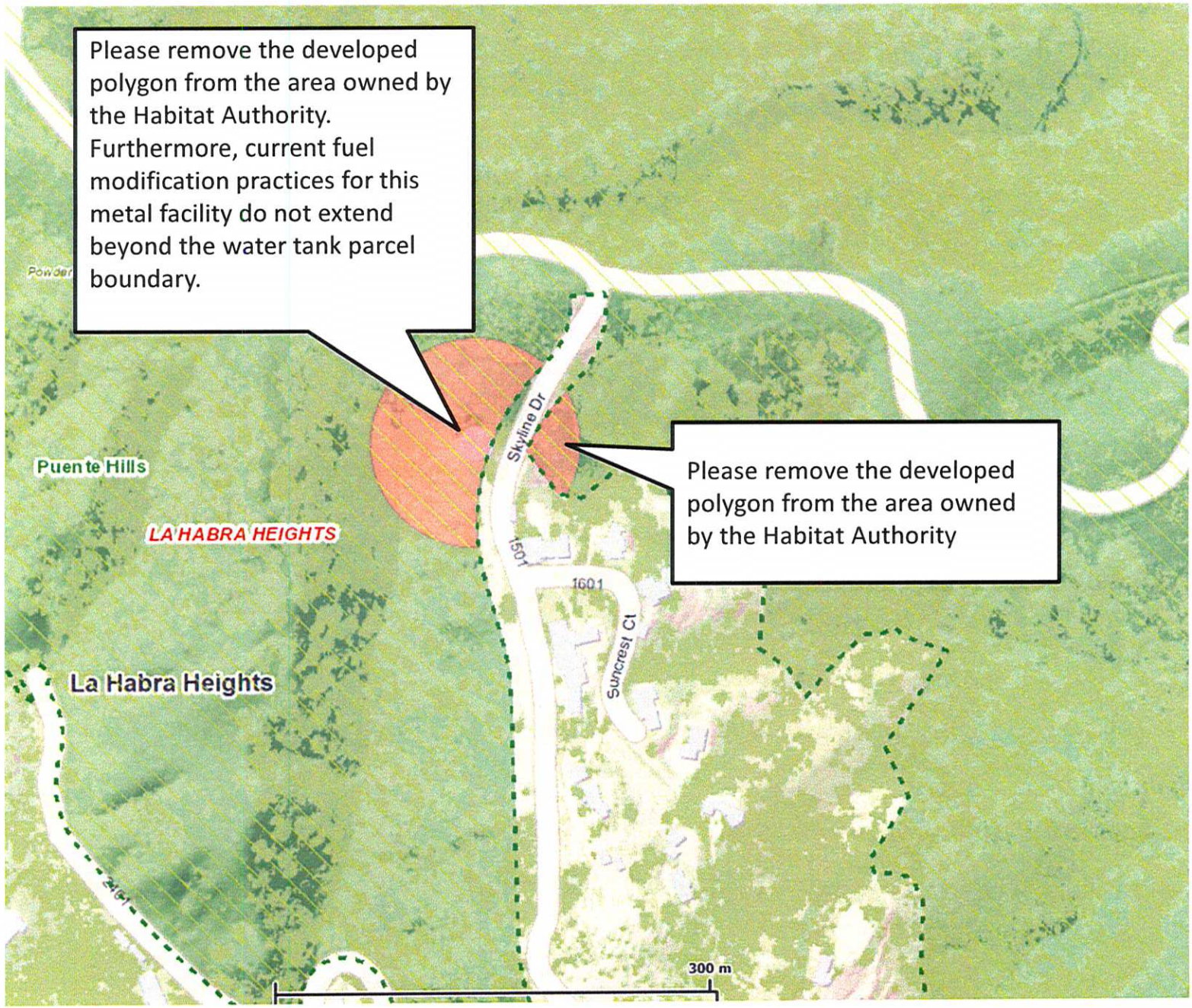
Please reduce the developed area on this map to only include the footprint of the water tank.

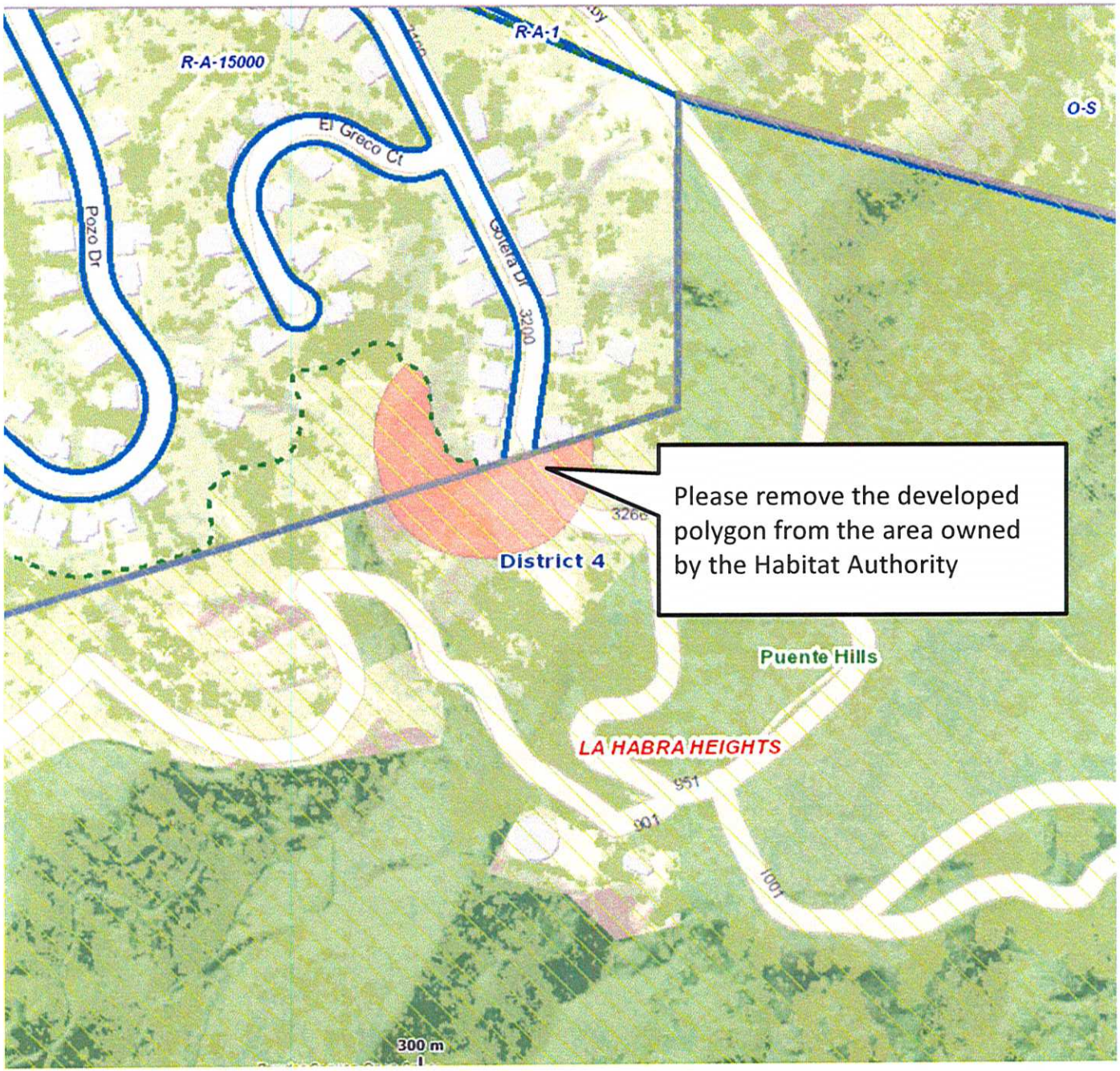


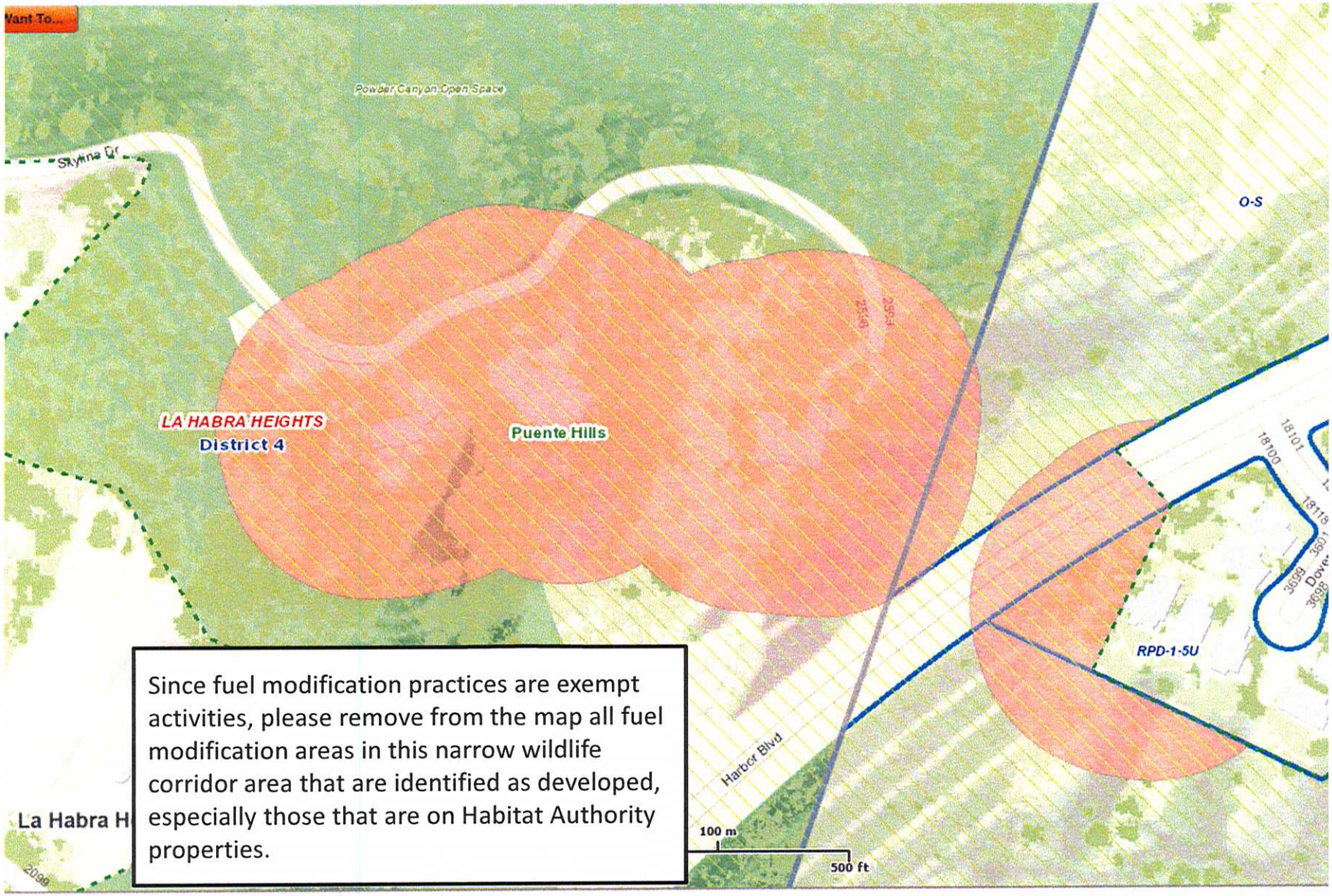
This structure at 201 E. Skyline Drive has been removed and no longer requires fuel modification as it is owned by the Habitat Authority. Please take this out of the developed area polygon.

La Habra Heights, Skyline Dr. and Hacienda Rd area


Please decrease the size of the "developed" area to only include the footprint of the water tank. The adjacent area is natural open space.
Puente Hills
District 4
LA HABRA HEIGHTS
Reposado Dr
801
1001
2201
Pinto Dr
300 m
1000 ft


Please remove the developed polygon from the area owned by the Habitat Authority. Furthermore, current fuel modification practices for this metal facility do not extend beyond the water tank parcel boundary.
Please remove the developed polygon from the area owned by the Habitat Authority
Powder
Puente Hills
LA HABRA HEIGHTS
La Habra Heights
Skyline Dr
1501
1601
Suncrest Ct
2161
300 m

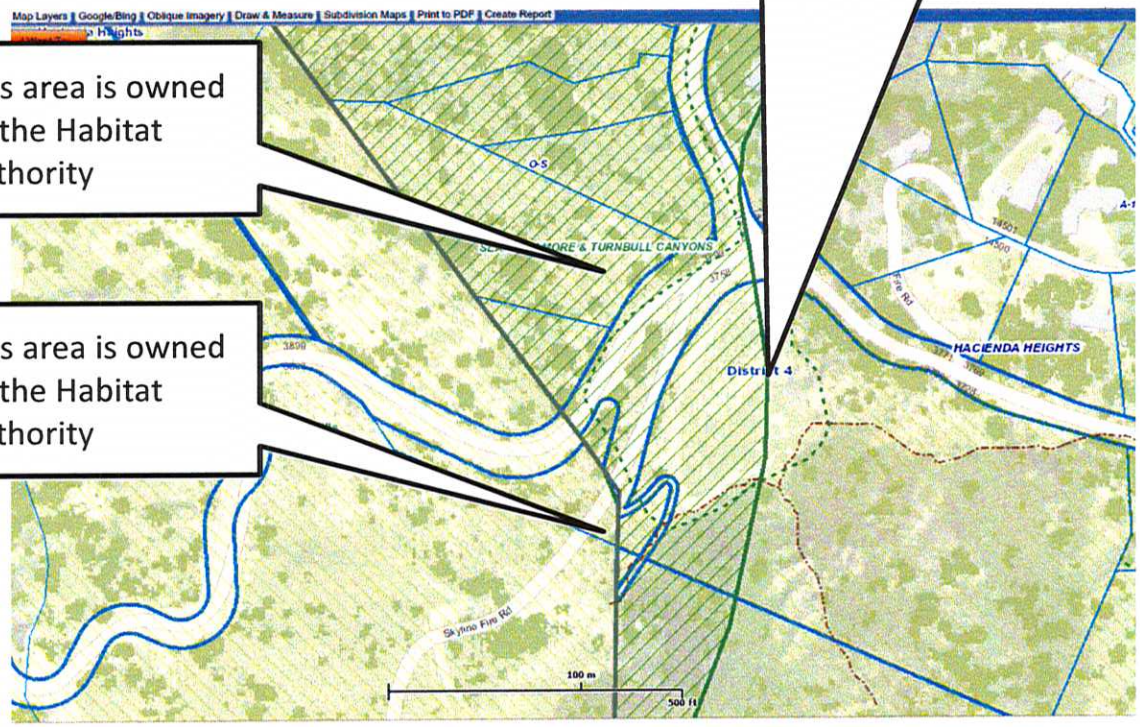

R-A-15000
R-A-1
O-S
El Greco Ct
Pozo Dr
Goleta Dr
3200
3260
District 4
Please remove the developed polygon from the area owned by the Habitat Authority
Puente Hills
LA HABRA HEIGHTS
957
901
1001
300 m



Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas in this narrow wildlife corridor area that are identified as developed, especially those that are on Habitat Authority properties.

The boundary of the SEA at this location is questionable as it touches 16199 Aurora Crest, an existing home.
Whittier
15801 Las Palomas Dr
Puente Hills
Coventry Cir
16101
8100
16121
16201
WHITTIER
15751
16001
8000
District 4
Peterson Dr
Stoneridge Dr 8000
16227
Aurora Crest Dr
16301
16000
16034
8200
Lindante Dr
Cerquita Dr
16066
16130
Newcastle Dr 8100
2375
Le Flore Dr
8400
8200
300 m
1000 ft

Please add this area back into the designated SEA as any future development here would most likely require fuel modification clearance on Habitat Authority property and which subsequent permission for such clearance would be denied by the Habitat Authority.



This area is owned by the Habitat Authority

This area is owned by the Habitat Authority

Hacienda Heights, Turnbull Canyon Road area