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Angeles Chapter

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RE: Comments on Draft Significant Ecological Area (SEA) Ordinance and Proposed SEAs

The Sierra Club is committed to maintaining the world's remaining natural ecosystems, and, where feasible, to the restoration and rehabilitation of degraded ecosystems. Wildlife, plants, and their ecosystems have value in their own right, as well as value to humans and to the health of the biosphere.

The following comments are submitted on behalf of the Sierra Club Angeles Chapter.

Draft Significant Ecological Area Ordinance – December 20, 2012

22.52.2640 Development Standards

C. 1. - Wildlife Impermeable Fencing

A project should not be able to isolate a population from connectivity. There should be requirements that the project proponent incorporated wildlife permeable fencing into enough of

F. - Streets and Highways

Wherever wildlife could be impacted by newly added traffic, the speed limit should be lowered and wildlife crossing signs should be installed.

I. - Wildlife Corridors

Wildlife corridors should not be narrowed at any point to less than 300 feet.

22.52.2670 – SEA Conditional Use Permit Review

C. SEA CUP Criteria - d.

Impermeable permanent hardscaping of an acre or more should also be permitted in an SEA.

Proposed SEA 4 – Ballona Wetlands

Area A of the Ballona Wetlands:

Sierra Club is grateful that the County has always understood and honored the ecological values of Area A of the Ballona Wetlands, an area bounded by Fiji Way to the north, the County Bike Path to the west, Ballona Creek to the south and Lincoln Blvd. to the east. Significant ecological values includes this area being a location where the sensitive White-tailed Kite, one of California's most protected species, hunts and where Great Blue Heron adults gather nesting materials and rest (loaf) and Great Blue Heron juvenile birds learn to hunt on their own. A survey coordinated by the Los Angeles County Natural History Museum in the 1980s found that – in spite of significant soil disturbance and movement of marsh soils from the adjacent marina area having been constructed in the 1960s and 1970s – this area was resident home to more than 100 native ant and ant-like species, which is remarkable on the edge of such a highly developed urban region. These insects, as well as many others are part of what holds together the ecosystem. In addition, Area A includes important rare populations of native Alkali Barley, Lewis' Primrose and other coastal species which are becoming increasingly more rare.

Following are recommendations of additional areas that are part of the Greater Ballona Wetlands Ecosystem. The wetland and lagoon habitat areas are part of what the National Audubon Society calls the Ballona Valley, which they have designated as an "Important Bird Area." More than 200 bird species have been documented in this region.

Additional State Lands to be Added to SEA list:

In addition to Area A of the Ballona Wetlands areas now owned by the State of California, Sierra Club asks that Area B, Area C and the Ballona Creek estuary channel – which include the entirety of the state-owned lands at the Ballona Wetlands, including the Ballona Wetlands Ecological Reserve, all be added to the SEA.

At the time that Area A was designated as SEA, it was common practice, we are told, to only include natural areas that were exclusively in county unincorporated areas. We understand that this is not the case today, and we ask – for the reason that these adjacent lands are equal in value to Area A in terms of exhibiting and retaining SEA qualities – that these areas all be added to the new SEA designations.

AREA B & Ballona Creek Estuary Channel - Area B includes the historical Centinela Creek slough channel, as well as nesting Belding's Savannah Sparrow, which is on the state endangered species list, and also hosts nesting Least Bell's Vireo, which is on the federal and state endangered species list. Also documented on site in Area B are the federally listed El Segundo Blue Butterfly and the Orcutt's Yellow Pincushion, a coastal wildflower species which was elevated to increased imperiled status by the state of California botanist during the last few years. Additionally, dozens and dozens of bird species have been documented here – everything from migratory song birds to water birds and shorebirds. Black-bellied Plover – anywhere from 1,200 to 2,000 winter in the salt panne and along the Ballona Creek estuary each winter. Migratory Monarch Butterflies inhabit the Eucalyptus Grove each year on the southern edge of Area A. Area B also includes numerous endemic plant species and several small mammals of the Los Angeles coast that are gone from other locations – such as the South Coast Marsh Vole.

Area C – Area C is home to a significant population of the rare Lewis’ Primrose. As well, the endangered California Gnatcatcher has been documented on site. In addition, numerous other birds use this area for foraging and shelter. White-tailed Kite, Loggerhead Shrike, Great Blue Heron and others are included. The site includes a historical tributary from the Los Angeles River from old maps of the area.

Additional City of LA-owned Lands to be Added to SEA List:

In addition to the state-owned lands, Sierra Club also requests that the following City of Los Angeles-owned lands be designated as Significant Ecological Areas (SEA):

Del Rey Lagoon – Once part of a 3-mile long lagoon system that was set back from the sea by a stretch of dunes, this lagoon at the southern end of the system is subject to full tidal influence and is a rich feeding and resting ground for migrating birds, as well as for resident species. Belted Kingfisher, American Wigeon, Long-billed Dowitcher, Snowy Egret, Great Egret, American Coot, Burrowing Owl, Bufflehead Duck and California Ground Squirrel are among the species that use this lagoon wetlands ecosystem.

Ballona Lagoon Marine Preserve – Across the Marina entrance channel from Del Rey Lagoon, this is the middle part of the once 3-mile long lagoon system and it is a shorebird haven, with numerous sandpipers like Marbled Godwit, Willet and Long-billed Curlew coming to this part of Los Angeles for the winter. In addition, a newly-fenced off sanctuary for the Orcutt’s Yellow Pincushion offers a glimpse of the nature of the historical sandy dune areas that once graced the edges of what was called Ballona Lagoon and Ballona Lake on historical maps.

Grand Canal Lagoon – This northern section of the historical Ballona Lagoon is part of what inspired Abbot Kinney to construct nearby Venice Canals and call them Venice of America. Meanwhile, this is the more natural-featured system, hosting a healthy population of Fiddler Crab and now – after a successful recovery and beginning restoration effort by the City of LA and Ballona Institute – ¼ of this lagoon area is on its way to again hosting native butterfly populations, as well as serving as feeding grounds for Snowy Egret, Great Blue Heron, Belted Kingfisher, and numerous other water birds, waterfowl and shorebirds.

California Least Tern Preserve – Traveling to Los Angeles every April from Guatemala and southern Mexico, the endangered California Least Tern nests on the Los Angeles/Venice Beach just to the north of the Marina del Rey boat entrance. These small graceful birds feed themselves and find food for their young - after hatching - in the Ballona Wetlands Ecological Reserve, as well as Ballona Lagoon Marine Preserve, Del Rey Lagoon and Grand Canal Lagoon. By mid-August, usually these birds are flying on their way south for the winter, but the next generations come back every year to the place where they were born – here on the Los Angeles coast.

Playa del Rey Sand Dunes – Sometimes called the Airport Dunes or the El Segundo Dunes, these sand dunes created once by the mighty flow of the Los Angeles River and the convergence at Playa del Rey of this river along with several other streams, are known to locals as the Playa del Rey Sand Dunes. Most famous for a tiny butterfly that feeds on a special variety of coast buckwheat, the El Segundo Blue Butterfly, which is on the federal endangered species list, these dunes are bit a remnant of a significant sand dune complex that once went southward all the way through the south bay beach cities. Actually,

the sand dunes are still there, but they are paved over and built on, so these dunes offer a glimpse into our historical ecology and natural history. Restoration efforts have assisted a partial recovery of the endangered butterfly and have brought recognition to other species of plants and animals that are in need of protection at this site. Once partially covered by houses, but returning to their natural condition more and more, these dunes are a natural treasure on the Los Angeles coast.

Toes Beach Dunes – The last remnant foredune on a Los Angeles beach that is wild and natural, this small sand dune includes a rare dune beetle, as well as a magenta sand verbena that is rare. Bird species from Del Rey Lagoon are often seen foraging or resting in these dune areas.

Westchester Parkway Dunes – Sandy dune swales and pocket wetlands are part of this interesting sand dune area that is north of LAX and has been recovering as natural habitat since homes were removed from the area due to LAX. Bird observations include White-tailed Kite, Loggerhead Shrike, Red-Shouldered Hawk, Ferruginous Hawk and Great Blue Heron.

Additional Thoughts:

COUNTY RARE SPECIES PROTECTION: While we appreciate any effort to make SEA designations for the areas listed above, we also acknowledge the limits such a designation might have and, therefore, also offer the suggestion of consideration of local/county endangered species designations, which are being supported by the California Native Plant Society in various regions, including Santa Cruz and Ventura Counties.

NESTING WATER BIRDS: In addition, several birds that are now resident in the Ballona Valley and forage/find shelter in the areas mentioned above, are now nesting in the county-owned Marina del Rey areas. These include Great Blue Heron, Snowy Egret, Great Egret and Black-crowned Night Heron. Since there are tree situations in flux in the marina with all of the current emphasis on redevelopment there, we would advocate that the trees where these birds nest somehow be included in an SEA designation since a part of their life cycles – an important part: reproduction – necessitates the protection of those nesting trees.

Our Sierra Club Ballona Wetlands Restoration Committee leadership is available to answer more of your questions or provide you with a site visit to any of these locations for a better understanding of the areas. Contact Marcia Hanscom at: wetlandact@earthlink.net (310) 877-2634 (mobile)

Besides Sierra Club Ballona Wetlands Restoration Committee, the Airport Marina Group is supportive of these additional comments for the SEA designations.

SEAs in the San Gabriel Valley area:

The proposed Puente Hills SEA in the western section of the Puente Hills, includes portions of the Montebello Hills, Whittier Narrows, Sycamore Canyon and Turnbull Canyon. Nearby is the proposed Rio Hondo SEA. To the north is the San Gabriel SEA, including the mouths of major canyons above Azusa, Duarte, Monrovia, Arcadia and Sierra Madre (San Gabriel, Sawpit, and Santa Anita Canyons) that

flow from the mountains. Also in this area at the margins of the San Gabriel Mountains is the San Dimas/San Antonio Wash SEA. In the eastern area of the Valley is the East San Gabriel SEA. We applaud the protection afforded by inclusion of these areas in proposed new or expanded SEAs.

However, we believe the SEAs discussed below be modified to increase development of connectivity of wildlife corridors extending from the Cleveland National Forest through the Puente-Chino Hills to the Montebello Hills and northward into the San Gabriel Mountains and the proposed San Gabriel Canyon and San Dimas SEAs. We believe the area of the Puente Hills SEA should be increased by including the disposal portions of the Puente Hills Landfill and combining the Rio Hondo SEA to the Puente Hills SEA. In addition we believe the channels and open space along the San Gabriel River be added to an SEA unit to connect the Puente Chino Hills with the San Gabriel Mountains along sediment lined channels.

East San Gabriel Valley SEA – Proposed SEA 6

We support the inclusion of most open spaces in the area of the proposed East San Gabriel Valley as indicated on the maps provided of this SEA. We also suggest inclusion of the open space north of Puddingstone Drive and south of Lantana Drive and west of the De Anza Drive region.

San Dimas Canyon/San Antonio Wash SEA

We support the inclusion of the open space area north of Claremont between the eastern area of the SEA, Miller Ranch Rd. and the Northeast La Verne portion of the SEA. It appears this area at the base of the San Gabriel Mountains is open space and is not included in the SEA. This area would add connectivity between the eastern portion of the proposed SEA and the area of Northeast La Verne

Puente Hills SEA Update - Proposed SEA 15

Proposed SEA map east of Harbor/Fullerton and north of the County line

It is stated in the Proposed Technical Appendix E for the proposed SEA boundary east of Harbor/Fullerton: “The southern boundary includes the canyon, but excludes the hills and grasslands of the oil field that are on the ridgeline and south of the canyon.” But the exclusion of this property south of the canyon should be changed. The current boundaries allow for only a single narrow canyon for wildlife movement, bordered on the north side by a housing development. This ignores evidence of wildlife movement in all parts of the Aera property, and not just the Drainage 26 canyon, as detailed in the June 2005 Conservation Biology Institute Study on “Maintaining Ecological Connectivity Across the ‘Missing Middle’ of the Puente-Chino Hills Wildlife Corridor” by Wayne Spencer. This study further states that, ...long, narrow gauntlets of ‘move-through’ habitat will not ensure continued functionality of the corridor system, which depends on retaining the large blocks of live-in habitat in the Missing Middle.” [Spencer page 26]

Another part of Technical Appendix E states, “It should be noted that the SEA includes areas disturbed and developed for rural residential and *oil extraction*.” [Emphasis added] Therefore, the fact that the excluded area has been used for oil extraction should not preclude it from being added to the SEA boundaries.

The following paragraph states, “While such areas do not represent key regional habitats, they have been recommended for inclusion in the SEA in order to recognize the importance of the wildlife corridor function of the SEA...” This area’s importance for animal movement, as noted above, fits into this description and speaks to its inclusion in the SEA.

At a minimum, this area should be designated as an Ecological Transition Area (ETA). The DRAFT SEA Ordinance identifies an ETA as, “...any portion of a lot or parcel of land within an SEA where the natural ecological features or systems have been degraded as a result of past or on-going land use activities but are deemed functionally integral to the SEA or support important plant or animal populations.” This area’s importance for wildlife movement has been documented.

Therefore the southern boundary of the SEA east of Harbor/Fullerton should extend all the way to the County line.

Changes to Criteria Analysis

There are two different versions of the Criteria Analysis on the County Webpage. Most importantly, one version has the status of the Core Population (A) and Extreme Biotic Resources (E) criteria changed to “Unmet.” If in fact these criteria have been changed to unmet on the latest draft, this is unacceptable and not supported by the facts.

For Criterion A on whether the conditions of habitat of core populations of endangered or threatened plant or animal species have been met, we will quote from the justification for this Criterion in Draft Technical Appendix E:

The population of the California gnatcatcher at the Montebello Hills is probably one of the largest single populations in the U.S. Pairs occur throughout the County portion of the Puente Hills, especially in Sycamore Canyon and Arroyo San Miguel. The coastal cactus wren has significant populations in the Puente Hills, occurring in the Montebello Hills, Sycamore Canyon, Rose Hills, Hellman Park in Whittier, and through Hacienda Heights into Rowland Heights. Several CNPS-Rare plants occur in the Puente Hills, including both Plummer’s and Weed’s mariposa-lilies.

This is obviously an important part of the justification for the SEA. But yet, in a different Criteria Analysis on the same page on the County’s website as the above Criteria Analysis, these justifications are discounted and the criterion is listed as not met.

This same issue occurs again for Criterion E, which refers to the conditions of biotic resources that are of scientific interest because they are either an extreme in physical/geographical limitations, or represent unusual variation in a population or community.

Again, we will let the County's own words speak for this criterion in Draft Technical Appendix E:

The Puente Hills represent the clear northern edge of the Peninsular Ranges. For this reason, taxa such as red diamond rattlesnake, occur here at the edge of their range, where they co-occur with the more widespread Pacific rattlesnake. Several bird species extend west through the Puente Hills into the Los Angeles Basin and the Whittier Hills (Oak Titmouse, Grasshopper Sparrow). These species are absent from the floor of the Los Angeles Basin. The Whittier Narrows Nature Center provides the public with extensive information and opportunities for field study of the Whittier Narrows natural environment.

Again, the justification of the other Criteria Analysis has discounted these resources and the criterion is listed as not met.

Which Criteria Analysis is the real Draft recommendation? If the Criteria Analysis that lists two Criteria (A and E) as unmet is the actual draft, then this is unacceptable. The County's own analysis speaks to the importance of the resources within the SEA and the Final Criteria Analysis should show all criteria having a status of "Met." To not do so would diminish the importance of the Puente Hills SEA.

Western portion of the proposed Puente Hills SEA (Proposed SEA 15) and the Rio Hondo SEA (Proposed SEA 16)

On October 31, 2013 the Puente Hills Landfill will be permanently closed to be managed in the future by public agencies as open space. Although this land is currently disturbed, plans are being discussed to restore native vegetation and keep the disposal region as open space devoted to low impact recreation such as hiking, bicycling, equestrian activities, and nature study. The area is located adjacent to the lands managed by the Puente Hills Habitat Preservation Authority that are already included in the Puente Hills SEA (PHSEA). These areas are in public ownership and will remain as open space; we believe the disposal area should be added to the Puente Hills SEA to expand contiguous habitat in the wildlife corridor in the western Puente Hills.

The proposed Rio Hondo SEA bounds the Puente Hills SEA on the southwest. Adding the disposal areas of the landfill to the Puente Hills SEA would develop a more complete connection of the PHSEA to the Rio Hondo SEA. The entire area could be united into a single SEA.

CALIFORNIA BUCKEYE GROVE

Located in Oak Canyon in Hacienda Heights, there exists a significant grove of California buckeye (*Aesculus Californica*) trees outside the boundary of the Puente Hills SEA. The majority of these trees (60-80 in number) are located in two small side canyons to Oak Canyon that drain from Edgeridge Avenue near its junction with Horticultural Drive to cross Tamarix Avenue near its junction with Oak Canyon Road. These trees fill these two north-facing drainages and are most prominent in early May when they are covered with white flower spikes. Many trees are also located in Oak Canyon directly

downstream from this stream junction, and a single tree is located in the drainage channel along Turnbull Canyon Road immediately south of its junction with Orange Grove Avenue.

Since these trees are undocumented south of the Tehachapi Mountains, this population could potentially have sprung from one or two seeds planted by a homeowner living in one of the isolated homes along Edgeridge Drive. Two facts dispute this. First, the hillsides are extremely rugged and covered with dense chaparral vegetation and the trees are not located on any of the small landscaped yards associated with the few homes in this area. Second, several buckeyes are located in Oak Canyon upstream of this confluence as well as in slopes not directly associated with this population. Two buckeyes have been observed on north-facing slopes in Turnbull Canyon as well, although these two trees do not appear to have survived a brush fire that occurred in this canyon a few years ago.

This scattered distribution might suggest that these trees may be a remnant population from a time when different climatic conditions allowed them to be distributed more widely than they currently are. In any case, further evaluation by a biologist, including possible genetic testing to ascertain their ancestry, would seem to be in order. If it is determined that they are the isolated remainders of a once more robust population, we believe they should be noted and included within the SEA designation.

We also believe the currently undeveloped open space between the landfill and the Community of Hacienda Heights on the east be included in the Puente Hills SEA. Habitat there is typical of other areas within the Puente Hills SEA and would serve as an areal extension of the wildlife corridor. In the region of Schabarum Regional Park, some privately held open space still exists in Pacific Heights. This area should also be included in the Puente Hills SEA.

The California Gnatcatcher is listed by the Fish and Wildlife Service as threatened. Areas designated as Critical Habitat for the California Gnatcatcher are present in both the Puente and Montebello Hills. “Core populations” (areas with 30 or more pairs) exist in both the Puente Hills and the Montebello Hills. The species has also been observed in the Whittier Narrows. The unification of the disposal areas of the Puente Hills Landfill, the Rio Hondo SEA and the area between Hacienda Heights and the disposal area would enhance the expansion opportunities for this species.

Another addition to this SEA should be the open areas along the Rio Hondo should be included in the Puente Hills SEA.

San Gabriel Canyon SEA – Proposed SEA 19

The National Park Service is presently conducting a “special resource study” of portions of the San Gabriel River watershed and the San Gabriel Mountains as a prelude to consideration of a National Recreational Area. Alternatives in this study include the channels of the San Gabriel River and the Rio Hondo as open space that can serve as avenues of wildlife movement between the San Gabriel Mountains and the Puente Chino Hills, Montebello Hills and Whittier Narrows. The San Gabriel River Master Plan also provides a comprehensive vision of these areas as a corridor that integrates the multiple goals of enhancing habitat, recreation and open space, while maintaining and enhancing flood protection, water supply and water quality.

The San Gabriel Canyon SEA includes large sections of the San Gabriel Mountains and foothills. It also includes areas along the San Gabriel River from the Canyon mouth to the Santa Fe dam.

We strongly support the inclusion of the streambeds and open space adjacent river channel of the San Gabriel River between the Santa Fe Dam region south to the Whittier Narrows. In addition, we propose the inclusion of the Duck Farm project into this SEA.

Santa Susana Mountains/Simi Hills SEA – Proposed SEA 23

The map of the proposed SEA of the Santa Susana Mountains/Simi Hills appears to include Oat Mountain or only land north of Oat Mountain. The land south of Oat Mountain along Browns Canyon Road, should also be included in this SEA since it has been habitat to native flora and fauna and has many native trees such as Sycamore. It is part of the wildlife corridor. Much of the valley floor should be protected as well as the steep slopes in order to facilitate wildlife migration.

Tujunga Valley/Hansen Dam SEA – Proposed SEA 25

The Big Tujunga Wash is one of the few places where this flower Slender Horned Spineflower has the conditions it needs for germination namely periods of flood followed by periods of drought.

We respectfully submit these comments,

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