WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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February 10, 2014

Emma Howard
Regional Planning Department
320 West Temple Street, Room 1354
Los Angeles, California 90012

Draft SEA Ordinance
Released December 5, 2013

Dear Ms. Howard:

The Wildlife Corridor Conservation Authority (WCCA) was created to provide for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. WCCA has been following the General Plan and Significant Ecological Area (SEA) development closely and provides the following comments on the draft SEA Ordinance, released December 5, 2013.

WCCA supports the inclusive proposed SEA boundaries and commends the County on applying this approach. We continue to compliment the County's efforts to propose more inclusive and biologically sound boundaries to ensure long-term sustainability of SEAs. However, a key area southwest of the Puente Hills SEA is not included in the newly proposed SEA boundaries. This area contains habitat resources for sensitive species found in the Puente Hills. WCCA recommends that the area shown on the attached map be included in the Puente Hills SEA.

Puente Hills Significant Ecological Area Boundaries

WCCA recommends the inclusion of an area east of Harbor Boulevard, in unincorporated Los Angeles County near the Los Angeles County/Orange County border (shown in the attached map). This area is part of the Aera project boundary. It serves a distinct and critical purpose in the broader integrity of the SEA by providing both habitat for coastal California gnatcatcher (*Polioptilla californica californica*) and buffer for adjacent core habitat and movement corridors. Any extensive development in this subject area would unquestionably harm the ecological integrity of the Puente Hills and potentially sever genetic connections across Harbor Boulevard. Any further substantial fragmentation of habitat in the Puente Hills would irreparably damage the biological resources WCCA is charged with protecting. Only inclusion in the SEA can provide the needed level of review and protection given the biological significance of the area.

The subject area is adjacent on several sides[1] to known populations of the federally threatened coastal California gnatcatcher.[2] The mixed native-nonnative grassland interface with coastal sage scrub provides ideal less-dense scrub preferred by the species. While dependent on coastal sage scrub within its U.S. range, the gnatcatcher regularly uses other habitats and shows seasonal and perhaps daily patterns in such use.[3] The subject area is positioned between three known occurrences, making it indisputably part of the gnatcatcher's range.

Grassland has noticeably reduced over time in the Puente-Chino Hills due to residential encroachment and the reestablishment of woody plants following the removal of grazing.[4] Vegetation patterns are dynamic and SEA boundaries should consider ecosystems in their entirety rather than static conditions. Any significant disturbance in the subject area would disrupt daily and seasonal patterns and critically threaten the viability of local gnatcatcher populations. Substantial loss of habitat in key areas in this location could irreversibly genetically isolate populations further west in the Whittier-Puente Hills.

Aside from the threatened gnatcatcher, grassland on or adjacent to the subject area is known to support breeding populations of other sensitive and declining bird species. A 1999 report on avian resources in the Puente-Chino Hills states:

> The exotic and semi-native grasslands of the Puente-Chino Hills may represent their greatest contribution to the breeding bird community of coastal Southern California, as so much of this habitat has been permanently lost to urbanization.

Subsequently, a 2000 study identified the grassland east of Harbor Boulevard on the Aera project site as one of three areas of highest conservation concern for birds in the Puente-Chino Hills region.[5] The author writes, "While smaller regions of grassland throughout the study area, such as the Whittier Hills, support a few pairs of species like the grasshopper sparrow or lazuli bunting, these and other grassland birds are abundant here." Breeding

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[1]Glen Lukos Associates. 2005. Biota Report. Aera Master Planned Community. Significant Ecological Area 15, Tonner Canyon/Chino Hills, Los Angeles/Orange County, California.

[2]*California Natural Diversity Database.* Department of Fish and Wildlife.

[3]Campbell, K.F., R.A. Erikson, W.E. Haas, and M.A. Patten. 1998. California Gnatcatcher use of habitats other than coastal sage scrub: Conservation and management implications. Western Birds 29:421-43.

[4]Campbell, K.F., R.A. Erikson, W.E. Haas, and M.A. Patten. 1998. California Gnatcatcher use of habitats other than coastal sage scrub: Conservation and management implications. Western Birds 29:421-43.

[5]Cooper, D.S. 2000. Breeding landbirds of a highly threatended open space: The Puente-Chino Hills, California. Western Birds 31:213-234.

pairs of the following sensitive species are known to occur in or adjacent to the subject area: white-tailed kite[6], golden eagle[7], greater roadrunner, lesser nighthawk, loggerhead shrike, horned lark, rufous-crowned sparrow, blue grosbeak, grasshopper sparrow, and western meadowlark. Any substantial diminution in habitat quality on the Aera site may cause a chain reaction of instability among sensitive species populations to the west. Without SEA designation of the subject area, these grassland-dependent sensitive species are expected to become locally extirpated.

Furthermore, the County's proposed SEA to the north of the subject area covers a narrow canyon that crosses Harbor Boulevard to the west. The edge effects of the existing Shea Homes development are already diminishing the value of the corridor through which all east-west Puente Hills wildlife movement occur using the Harbor Boulevard Wildlife Underpass. Should the southern edge of this narrow corridor be similarly developed, the entire corridor will be subjected to the direct and indirect impacts of urbanization. The only way to protect the biological integrity of the movement corridor is to provide as much open space buffer as physically possible. The subject area provides ancillary habitat benefits by serving as an extensive southern buffer for wildlife using the underpass to cross Harbor Boulevard.

Although we note that the County has expanded the SEA slightly in the Puente Hills area, more gnatcatcher habitat can be protected by expanding SEA boundaries to include this key subject area. Conservation biology principles clearly warrant that additional expansion in the Puente Hills area must include the rest of the southwest corner of the Aera project property boundary. There is no biological justification for not including the subject area.

We appreciate your consideration of these comments. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at judi.tamasi@mrca.ca.gov. Thank you for your consideration.

Sincerely,

Glenn Parker
Chairperson

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[6]Ibid. Cooper notes that fewer than ten breeding pairs are known in the Puente-Chino Hills.

[7]Ibid. Cooper notes that only one or two breeding pairs are known in the Puente-Chino Hills.

Wildlife Corridor Conservation Authority

Proposed Addition to Puente Hills SEA Boundaries

February 10, 2014

From Los Angeles County SEA Development Map 4: