

November 7, 2013

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

**Comments on Revised Draft Los Angeles County General Plan 2035 (rev. 10/2013)**

Dear Ms. Chung and Mr. Glaser:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the revised draft General Plan dated October 2013. On previous General Plan drafts, we provided comment letters dated 08/29/2007, 01/22/2009, 09/08/2011 and 07/26/2012. 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.

## COMMENTS RELATING TO DRAFT GENERAL PLAN

### Mobility Element

On page 103, Section 5, paragraph 2, amend the following sentence to include the portion in italics “At the same time, transit infrastructure creates physical barriers across wildlife habitats and corridors that can reduce the mobility of local species, *contribute toward mortality*, and threaten genetic diversity”. Since this section is titled “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.

In Policy M 7.3 and M 7.5 (page 112), we recommend using best practice design to encourage the passage of species through/across transportation infrastructure upon rehabilitation/retrofitting of existing structures as well as during the creation of new roadways or other transportation systems.

### Conservation & Natural Resources Element

Under Conservancy Lands on page 127, we recommend adding the italicized wording to the following sentence “The County is home to scenic areas and diverse topographic, geologic, and vegetative features *that provide important habitat for wildlife but also hold recreational value*”.

### Safety Element

On page 215, please add to Goal S.2: Coordination with other public agency emergency planning and response activities.

### Appendix E

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 174, the last paragraph still references the old agency name.

## COMMENTS RELATING TO SIGNIFICANT ECOLOGICAL AREAS (SEAs)

### Conservation & Natural Resources Element

On page 137, 2<sup>nd</sup> paragraph, the Habitat Authority recommends allowing important auxiliary park uses (e.g. trails, park offices, parking, restrooms, signage, fencing, gates, and temporary uses, etc.) by conservancy/park agencies on lands designated as SEAs. From time to time the Habitat Authority will propose improvements to the open space such as low impact recreational trailheads, trails, wildlife road underpasses, or fences to limit illegal off-road activity on protected preserve areas. Our intentions with these and similar projects are to design them around the existing biological resources to ensure the resources will continue to function and even flourish. We recommend that open space management activities of this nature be considered as compatible and appropriate within a SEA. More specifically, we recommend 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 mission of their agency.

On page 139, 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.

#### **Appendix E: Conservation and Natural Resources Element Resources**

On page 43, 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](http://www.habitatauthority.org/publications)).

The Conservation and Natural Resources Element (Chapter 9) also discusses the importance of regional habitat linkages and wildlife corridors (pages 134-135). In addition, Appendix E (Conservation and Natural Resources Element) of the Draft General Plan notes 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” (page 46). This Appendix also states 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” (pages 46-47).

Please consider revising SEA selection criteria to directly acknowledge the importance of habitat connectivity and wildlife movement corridors on pages 47-48. It is clear from the above language in the Draft General Plan that wildlife movement corridors and habitat connectivity are critical to the concept of SEAs. However, the updated 2000 SEA selection criteria do not mention wildlife movement, corridors, or habitat connectivity<sup>1</sup>. 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 language cited above. 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

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<sup>1</sup> PCR. 2000. Los Angeles County Significant Ecological Area Update Study 2000: Background Report. Prepared for: Los Angeles County Department of Regional Planning. November 2000.

this potential movement may pose a serious threat to the persistence of these populations in the future<sup>2</sup>.

The following comments are regarding the description of the Puente Hills SEA, beginning on page 172:

- On page 174, third paragraph, please note that the riparian habitat in Sycamore Canyon is mostly comprised of willow and sycamore, not exclusively oak riparian, and that Turnbull Canyon does not support a “forest of ash”. Please also note that Sycamore Canyon also supports coastal cactus wrens.
- On page 175, please also note that “Verde Creek” is actually referred to as “La Cañada Verde Creek”.
- On page 175, second paragraph, please note that Powder Canyon also supports California walnut woodland in addition to “north-slope oak woodland”.
- On pages 177-178, please note that oak woodland habitat is also prevalent in the hills of Hacienda Heights, and that walnut woodland habitat is also prevalent in Powder Canyon.
- On page 177, please note that oak riparian forest is not extensive in Powder Canyon.
- On page 178, the description of mixed chaparral habitat includes a bulleted list of “corresponding MCV communities”, including several dominated by chamise, manzanita and ceanothus; however, none of those species occur in the Puente Hills, at least not as dominant species.
- On page 178-179, the description of coastal sage scrub habitats notes that it exhibits a “less robust structure” than mixed chaparral. Please indicate what is meant by the word “robust”, and whether it is intended to denote shrub height or evergreen. Referring to coastal sage scrub as “less robust” may be misinterpreted as unhealthy or otherwise deficient compared to chaparral, which is not the case. Also, this description notes that coastal sage scrub exists as “scattered patches”; however, it also exists in some areas as large, contiguous stands. In addition, coastal sage scrub not only persists within former oil extraction areas as noted in the description, but it has also recovered and reestablished in some formerly disturbed and developed areas. Finally, please note that cactus scrub is a very important subunit of coastal sage scrub, which is found extensively on southerly and westerly slopes, especially in Sycamore Canyon, Hellman Park and La Habra Heights. Please also note that this description gives the incorrect scientific name for California sagebrush (it should be *Artemisia californica*, not *A. tridentata*). In addition, the list of “corresponding MCV communities” contains several errors, including in the third listed a misspelling of the scientific name *Eriogonum fasciculatum* (not *fasciculatuma*) and the absence of the word “buckwheat” before the word “scrub”. Several of these MCV communities also do not occur in the Puente Hills: bush poppy scrub, ashy buckwheat scrub, Wright’s buckwheat patches, sawtooth golden bush scrub, and silver bush lupine scrub.

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<sup>2</sup> Conservation Biology Institute. 2005. Maintaining Ecological Connectivity Across the “Missing Middle” of the Puente-Chino Hills Wildlife Corridor. July 2005.

- On page 179-180, the description of non-native grassland should indicate that this habitat can include patches of native grasses and wildflowers, and is capable of supporting sensitive species, including mariposa lilies and grassland-dependent birds.
- On page 180, please remove Freshwater Marsh section in its entirety since no actual freshwater marsh habitat exists within this SEA in Los Angeles County, though there is substantial freshwater marsh to the west, within Whittier Narrows.
- On page 180, regarding wildlife species, the last paragraph states that “the SEA is likely to support a variety of amphibians in abundance...”. The Habitat Authority’s Resource Management Plan and a study conducted by the U.S. Geological Survey document the presence of several locally-rare and/or sensitive amphibian species. These reports are also available on the Habitat Authority’s website ([www.habitatauthority.org/publications](http://www.habitatauthority.org/publications)).
- On pages 180-181 under Wildlife – the following information is important to include:
  - Invertebrates were investigated by LSA (2005), who documented several scarce butterflies, including California Dogface *Colias eurydice*, Western Tailed-Blue *Everes amyntula*, and Mormon *Apodemia mormo* and Fatal *Calephelis nemesis* Metallarks. These are scattered throughout the hills.
  - The herpetofauna of this SEA was investigated by Haas et. al. (2002) and LSA (2005), who found the hills to support several locally-rare and/or sensitive species including Western Spadefoot (one recent record vic. Skyline trail south of Hacienda Hts.), Arboreal Salamander *Aneides lugubris* (Whittier Hills, Powder Canyon), two species of slender-salamander (*B. nigriventris* and *B. major*; widespread), Coastal Western Whiptail *Cnemidophorus tigris* (widespread), Red Diamondback Rattlesnake *Crotalus rubes* (localized), and Western Blind Snake *Leptotyphlops humilis* (Powder Canyon).
  - Sensitive mammals include the Desert Woodrat *Neotoma lepida* and habitat specialists like the Cactus Mouse *Peromyscus eremicus* (Whittier Hills) and the Western Gray Squirrel *Sciurus griseus* (Powder Canyon).
  - The Puente Hills is extremely important for bats, and 11 species were documented here during a recent study (Remington 2006), including such sensitive species as Yuma myotis *Myotis yumanensis*, western red bat *Lasiurus cinereus*, pallid bat *Antrozous pallidus*, pocketed free-tailed bat *Nyctinomops femorosaccus* and western mastiff bat *Eumops perotix*.
  - A major study (LSA 2007) compiled much of the pertinent information on the sensitive wildlife and plants of the Puente Hills within the Habitat Authority’s jurisdiction. The federally Threatened California Gnatcatcher occurs in at least two areas of the hills, vic. Arroyo San Miguel east of Colima Drive and a smaller possibly irregular population along Sycamore Canyon in the western Puente Hills. These represent some of the last locales for this bird in the Los Angeles Basin, and some of the farthest-north individual of the species.

- On page 181, regarding mammals in the second paragraph, a study was conducted for bats on the Preserve and found 11 different species, seven of which are sensitive species; this report is also on the Habitat Authority's website.
- On page 181, regarding wildlife species, paragraph one states that several species of birds may use this SEA as their only consistent occurrence in the southeastern portion of the County. Given the importance of this statement regarding the SEA, please list some of these bird species as examples.
- On page 181, regarding wildlife species, the second paragraph should note that this SEA supports bobcats and mountain lions among the mammal community, which indicates the connectivity and quality of the habitat in this SEA considering that these mammals are sensitive to fragmentation.
- On page 182, second paragraph, it mentions several sensitive plant communities that occur in the Puente Hills SEA. However, several are not known to occur in the Puente Hills: Engelmann oak woodland, chamise-white sage chaparral, Wright's buckwheat patches, sawtooth golden bush scrub, and pickleweed mats.
- On page 184, please include a more detailed description of the Ecological Transition Area (ETA) noted in the Puente Hills SEA, and explain the reason for its designation. It is our understanding that previous SEA comments are still being incorporated and ETA's may be defined in more detail in the upcoming draft.
- On page 185 in the table for the Criteria Analysis of the Puente Hills SEA, under the justification for Criteria A, it notes that both Plummer's and Weed's mariposa lilies are present. However, according to recent analyses commissioned by Southern California Edison in consultation with several rare plant experts, only Weed's mariposa lily is present in the Puente Hills.

### **SEA Ordinance**

It is our understanding that comments on the SEA Ordinance, and sections relating to the SEA in the General Plan, are still being addressed. The Habitat Authority's comments on the SEA Ordinance remain unchanged from our letter dated March 20, 2013 (see attached). As requested, below are previously submitted comments.

As noted in the Draft General Plan, numerous wildlife studies have been conducted in the Puente-Chino Hills documenting wildlife movement and habitat connectivity and, as such, the Puente-Chino Hills Wildlife Corridor is widely acknowledged as having regional significance (see [www.habitatauthority.org/publications](http://www.habitatauthority.org/publications) for links to reports). Given the existing limitations on the Wildlife Corridor due to existing development, any remaining undeveloped habitat is important to maintaining the function of the Corridor, particularly at narrow "choke" points, such as along Hacienda Road, or at major roadways, such as Colima Road and Harbor Boulevard. It is presumed that, for this reason, habitat surrounding Hacienda Road has been designated as an "Ecological Transition Area" (ETA) on the proposed Puente Hills SEA map. Other areas of undeveloped habitat adjacent to the proposed Puente Hills SEA which are not included in the SEA boundary may also be considered as ETAs, as they could be functionally integral to maintaining wildlife movement throughout the SEA. It is our understanding, based on the current draft SEA Ordinance (provided by the County on December 20, 2012), that

projects proposed in ETAs would still receive an initial project appraisal (if not exempt) by the Director, which may possibly require a Conditional Use Permit; however, it is unclear if this would involve review by the SEA Technical Advisory Committee.

Habitats Critical to Bird Species and Communities

Please consider expanding the Puente Hills SEA to include areas of adjacent undeveloped habitat, particularly sage scrub and grasslands, which are critical for rare bird species and, as such, meet the SEA criteria for inclusion. For example, the Rio Hondo SEA should be considered for inclusion in the Puente Hills SEA, as well as surrounding undeveloped habitat given its direct habitat connectivity, geographic proximity, and similar natural resources. This would be consistent with the inclusion of other areas such as the Whittier Narrows and Montebello Hills in the Puente Hills SEA.

Much of the undeveloped open space in the Puente Hills is also considered to be critical habitat (Unit 9) for the federally threatened coastal California gnatcatcher (*Polioptila californica californica*). These are areas that have been designated by the U.S. Fish and Wildlife Service (USFWS) as essential to the conservation of the species. Although most of these areas are already within the proposed Puente Hills SEA boundaries, some areas have been excluded, despite the fact that they meet the SEA criteria. For example, updated SEA Criterion A requires that an area contain “the habitat of core populations of endangered or threatened plant or animal species”<sup>3</sup>. The USFWS’s designation of Critical Habitat Unit 9 (which includes the Puente Hills) noted that core populations of gnatcatchers are “known from the south slopes of the Puente-Chino Hills from Whittier east to Yorba Linda” and that “the unit provides the primary connectivity between significant gnatcatcher populations and sage scrub habitat within units 6, 10 and 12”<sup>4</sup>. This critical habitat is composed of both sage scrub and non-sage scrub habitats, including grasslands in proximity to sage scrub that provide space for dispersal, foraging, and nesting, which are essential to the life history functions of the species<sup>5</sup>.

Grassland habitat is also unique in the Puente Hills, and possibly in the Los Angeles Basin. Scott and Cooper (1999)<sup>6</sup> listed 22 bird species considered to be vulnerable to extirpation due to habitat loss, and many of which rely on grassland habitat. They also noted that grassland habitat in the Puente-Chino Hills (including non-native grassland habitat) may contribute the most to the breeding bird community of coastal Southern California, since so much of it has been eliminated.

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<sup>3</sup> PCR. 2000. Los Angeles County Significant Ecological Area Update Study 2000: Background Report. Prepared for: Los Angeles County Department of Regional Planning. November 2000.

<sup>4</sup> Federal Register, Final Rule: Endangered and Threatened Wildlife and Plants; Revised Designation of Critical Habitat for the Coastal California Gnatcatcher (*Polioptila californica californica*). Vol. 72, No. 243. Wednesday, December 19, 2007.

<sup>5</sup> Federal Register. Ibid.

<sup>6</sup> Scott, T.A., and Cooper, D.S. 1999. Summary of avian resources of the Puente-Chino Hills Corridor. January 1999.

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We appreciate the opportunity to comment on this document. Please notify us when the Habitat Conservation Plan, Mitigation Land Banking Program, Trails Master Plan, Open Space Land Acquisition Strategy, Oak Woodland Conservation Management Plan, and SEA Ordinance documents are available for public review. We will be submitting comments to you on the Hillside Management Plan by December 9, 2013 as previously discussed.

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

Attached:  
Previous letter dated March 20, 2013