

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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November 4, 2015

Michelle O'Connor
Departmental Facilities Planner I
Los Angeles County
Department of Parks and Recreation
Planning & CEQA Section

Via email at: moconnor@parks.lacounty.gov

Puente Hills Landfill Park

Dear Ms. O'Connor:

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 Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. It is one of our main goals to ensure that sufficient continuity of habitat can be preserved to maintain a functioning wildlife corridor within this area. The Puente Hills Landfill Park project is located at the western end of this wildlife corridor. According to the project website, after publication of the Notice of Preparation and Initial Study, a scoping meeting for the Environmental Impact Report (EIR) would occur in January 2016.

The County has a unique opportunity to complement the existing natural areas and trails in the Puente-Chino Hills wildlife corridor by implementing a park that focuses on preservation of, and connectivity to, open space; habitat restoration; and low-impact recreation. In order for the wildlife corridor to remain functional in the long term, a major portion of the landfill property must remain as natural open space. WCCA supports the comments previously provided by the Puente Hills Habitat Preservation Authority (Habitat Authority):

- a design that continues to support the existing use of the adjacent area by wildlife;
- opportunities for low-impact recreation;
- a long term operation plan including ranger (law enforcement), trail patrol (throughout the hills and in the connecting Habitat Authority lands), and maintenance, to address recreational use spilling over into other open space lands from the proposed project.

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Potential Uses of Park

WCCA "strongly likes" the following uses (identified in the workshop slides): wildlife habitat viewing and restoration, multi-use trails, picnic areas, shade structures, nature programs, and learning about the Puente Hills' significance.

WCCA concurs with the County pursuing a passive park as defined for a County Regional Park in a slide from the first workshop. On that slide, passive park is defined as the following:

Oriented primarily to the enjoyment of the natural environment and typically include multi-use trails, picnic areas, bird watching, benches, viewpoints, park pavilions and interpretive displays.

Any physical developments or improvements should emphasize preservation of natural open space, connectivity to existing open space (onsite and offsite), minimizing development footprints, and minimizing edge effects (e.g., lighting, noise, excessive human activity). For example, a park pavilion on a site like this may be appropriate, as long as the scale, location, and theme fit the site.

The EIR should include a description of the phasing of the project. The first phase should include low-impact uses (e.g., trails), as well as habitat restoration and preservation.

The EIR should also include a clear description of the proposed parking (e.g., number spaces and locations) in all alternatives. The EIR should include the County's rationale for the parking areas. The parking, and other park features (e.g., fencing), should be designed to allow the public to easily access and enjoy the trails, and also to encourage their use in certain areas and discourage their use in other areas. A well-thought out park design could reduce the need for enforcement.

Need for Habitat Preservation, Connectivity, and Restoration

Any Preferred Park Concept should include a framework for habitat preservation, connectivity, and restoration. The project site is located at the western edge of Puente-Chino Hills wildlife corridor. The park should include habitat (preserved and restored) that provides ecological connectivity to other Significant Ecological Areas ("SEAs"; such as the Rio Hondo Collect Wildlife Sanctuary SEA) and adjacent and nearby habitat and open space. This should include connectivity for mammals and birds. In addition, only uses that maintain habitat value onsite and offsite by minimizing edge effects (e.g., minimal lighting, no excessive noise, controlled access by sensitive habitats, etc.) should be allowed. For

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example, the County should consider closing access at night (like many other parks), or restricting night-time access to limited uses such as small educational "campfire" programs.

Need for Maintenance, Enforcement, and Accompanying Funding

To reiterate, the Preferred Park Concept and all alternatives should include a clear enforcement and maintenance component. Specificity such as funding sources, number of staff, frequency of patrols and maintenance rounds, etc. should be included in the project description and the EIR. This is critical to address the anticipated new public use on the subject parkland, and also to address additional public use of adjacent parkland, including Habitat Authority-owned land. The EIR should address how other park agencies will be affected by the increased use on the existing adjacent (and nearby) parkland and what mitigation is proposed to offset any adverse impacts.

Alternatives

In order for the wildlife corridor to remain functional in the long term, a major portion of the landfill property must remain as natural open space. Alternatives that support more natural open space best meet this regional need.

The slides from the second community meeting indicate that there are three alternatives considered: Alternative 1: Ecology, Alternative 2: Recreate, and Alternative 3: Upcycle. WCCA prefers Alternative 1: Ecology. WCCA looks forward to studying the environmental analysis in the upcoming EIR in order to offer any recommended changes to that alternative to reduce impacts in that (and other) alternatives. WCCA would like more information on the scale and intensity of the components. For example, in Alternative 1 and Alternative 3, a performance space is shown. A large amphitheater with night-time concerts, and the associated noise, lighting, traffic, and intense human activity does not appear to be compatible with preserving the natural open space in this wildlife corridor. WCCA is also interested in seeing other alternatives to the Bike Skills Area in Alternative 1, for example by incorporating the Hill Overlook as proposed in Alternative 2. If bicycling is allowed, there must be a solid accompanying enforcement mechanism to prevent unauthorized incursions by bicycles into native habitat areas.

Specifically, WCCA recommends that Alternative 3: Upcycle be deleted in favor of a less intensive alternative that favors preservation of natural open space, habitat restoration, and low-impact recreation.

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History of Park Planning

The EIR should clearly state how the Preferred Park Concept and all alternatives meet the historic intent and requirements for the landfill park. A slide from the first community meeting about Site History indicated that in 1983 the County permit required fill areas to be open space in perpetuity. The EIR should explain how this requirement is being met. Another slide on Site History indicates that in 2013 a Feasibility Study establishes a passive park. The EIR should include an explanation of how that study is being applied.

We appreciate your consideration of these comments. Please add our agency to your mailing/email list for this project. 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.

Sincerely,

Glenn Parker
Chairperson