



## HAMILTON BIOLOGICAL

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**SUBJECT: COMMENTS ON INITIAL STUDY FOR  
PROJECT NO. 2018-000207-(4)  
HSI LAI MONASTERY SITE PROJECT  
15866 DRAPER ROAD, HACIENDA HEIGHTS, CA**

Dear Ms. Hui,

On behalf of Hills For Everyone, Hamilton Biological has reviewed the Notice of Preparation (NOP) for the proposed Hsi Lai Monastery Site project, on a project site covering 28.96 acres in the Community of Hacienda Heights, Los Angeles County. The proposed project consists of:

- Constructing 17 buildings on the northern portion of the site with a combined total of 143,671 square feet of programmed space, including the renovation of one existing 5,318-square-foot residential building, with associated landscaping and walkways.
- Converting Draper Road from a mostly unpaved public trail to the access road for the project, including realignment of the eastern part of the road.
- Establishing two driveways along South Hacienda Boulevard.
- Landscaping and construction of walkways.
- Creating a new multi-purpose trail through oak woodlands in the southeastern part of the project site.
- A total of 297 parking spaces would be provided on site. The project would retain 11.82 acres (54 percent of open space area) as natural open space and an additional 10.05 acres (46 percent of open space area) as improved open space, reportedly consistent with the metrics established in the County's Hillside Design Guidelines.

- The project would require approval of a conditional use permit (CUP) to authorize the proposed uses and development within the Hillside Management areas, the grading of more than 100,000 cubic yards of soil, and an oak tree permit for the proposed oak tree removals and encroachments.

I have reviewed the relevant portions of the Initial Study, including Appendix B-1, a Biological Constraints Analysis dated December 2019, prepared by Rincon Associates, Inc.

Before preparing these comments, I visited the project site and surrounding areas on November 21, 2020, from 1:40 to 2:45 p.m. In addition to observing the biological resources on the site, I inspected the existing pedestrian undercrossing that passes beneath South Hacienda Boulevard, near the project site.

I support all of the recommendations contained in the comment letter submitted to your office by the Puente Hills Habitat Preservation Authority (PHHPA), dated November 19, 2020, and will address some of issues in greater detail than they did.

## **EIR MUST FULLY ADDRESS MOVEMENT/CONNECTIVITY ISSUES**

The Puente-Chino Hills Wildlife Corridor (the Corridor) constitutes one of the most-studied wildlife corridors in North America (LSA Associates 2007). Increased development surrounding and within the Preserve has increasingly fragmented the area, resulting in isolated islands of habitat. Maintaining the Corridor's ecological integrity and bolstering the functionality of its constituent linkages are widely recognized as important conservation objectives, regionally and globally, within the densely urbanized Los Angeles Basin (Spencer 2005).

### **Overview of Habitat Connectivity/Wildlife Movement Issues**

Constricting the movement of wildlife and plant seeds increases the risk of local extinctions. Habitat fragmentation consequently threatens the viability of these remaining natural resources. Large areas of habitat, or narrower linkages of habitat between large areas, provide movement opportunities for wildlife. Movement serves to facilitate the geographic distribution of genetic material, thus maintaining a level of variability in the gene pool of an animal population. Influxes of animals from nearby larger populations contribute to the genetic diversity of a local population, helping to ensure the population's ability to adapt to changing environmental conditions. This is mainly accomplished through the dispersal of juveniles from their natal territories, but may also involve movements in response to drought or other adverse environmental conditions, or emergencies such as wildfires.

Many plant species that depend on relatively sedentary insects for pollination also benefit from habitat linkages that allow for genetic exchange and dispersal. Reduced insect movement due to habitat fragmentation results in reduced genetic vigor in those plants. Likewise, plant seeds and propagules can be transported via the feces, fur, or feathers of birds or mammals.

Fragmentation effects are not limited to the physical severing of movement routes, such as through the construction of a road or housing development, but include such “edge effects” as increases in night lighting, human activity, and noise, which may potentially disrupt the movement patterns of species not well-adapted to such effects.

The Corridor is crossed by eleven roadways, each representing a potential barrier to the movement of terrestrial wildlife. Lyren (2001) identified collisions with vehicles as the primary cause of coyote mortality in the Chino Hills/Prado Basin area. The responses of wildlife to the provision of road undercrossings, and to other efforts undertaken to facilitate wildlife movement, have been studied on lands managed by the PHHPA by Haas and Crooks (1999), Haas and Turschak (2002), Elliott and Stapp (2008), and Stapp and Cashin (2009).

The project site lies at an especially vulnerable location within the Corridor. Figure 1, below, shows that the Corridor’s width narrows markedly in the vicinity of the project site, forming what is known as a “chokepoint” for wildlife movement.

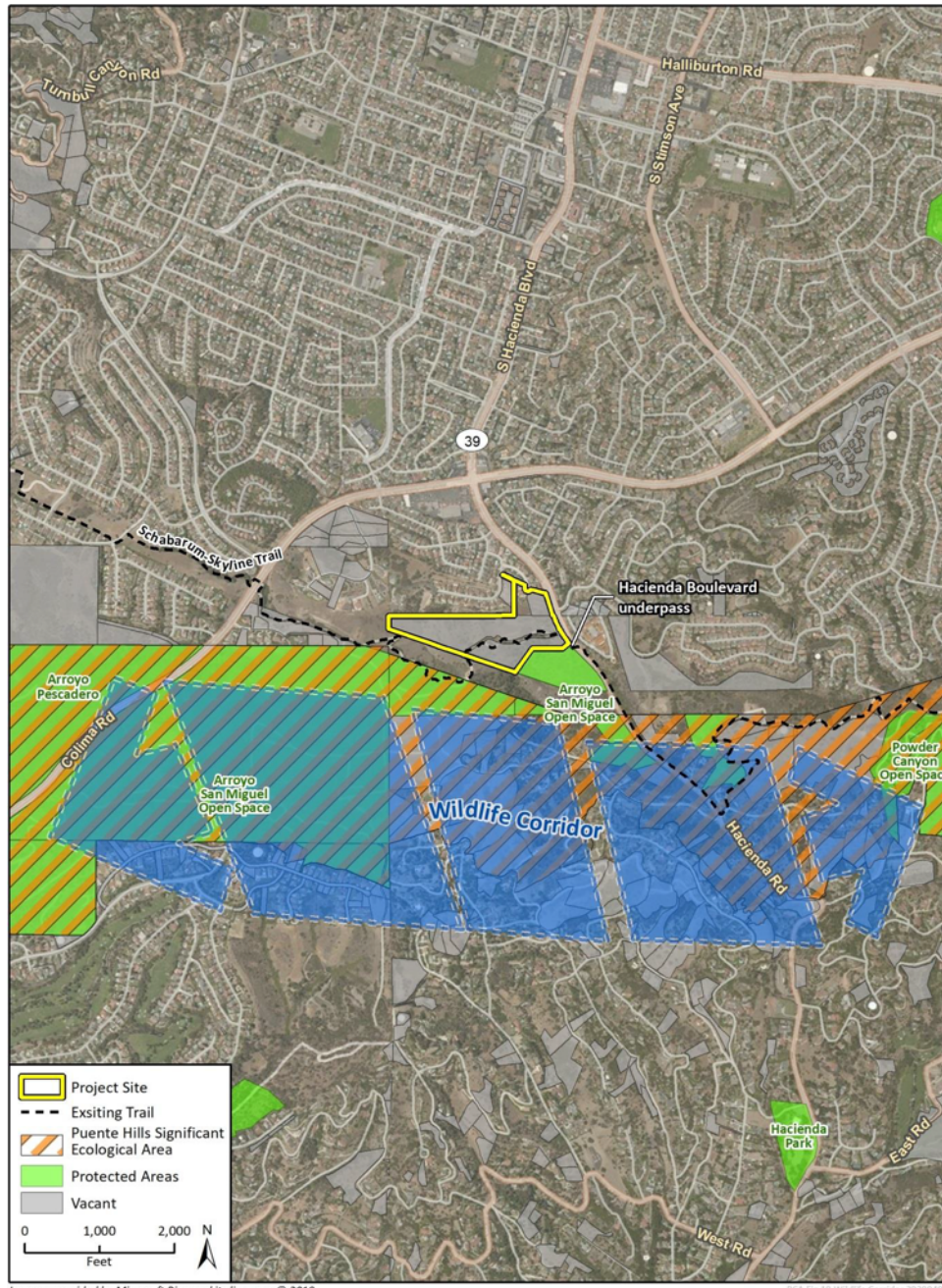


**Figure 1.** Aerial view, facing west, showing that the project site (yellow outline) occupies a large part of the tenuous, east/west habitat linkage bisected by South Hacienda Boulevard. *Source: Google Earth Pro.*

Figure 10 on page 38 of Appendix B-1 – reproduced on the next page of this letter – suggests that a “wildlife corridor” exists in the residential neighborhoods located south of the project site, but the project biologists cite no current, credible, site-specific studies in support of this controversial opinion. For reasons discussed in this letter, an adequate and credible Draft EIR will need to address issues of wildlife movement and habitat connectivity much more carefully than has the Initial Study.



Referring again to Figure 10 from Appendix B-1 of the Initial Study, reproduced below, the land hidden beneath the massive blue arrow labeled “Wildlife Corridor” consists of low-density and high-density residential housing. Although some animals may move through that area, the project biologists lack data to map a “wildlife corridor” south of the project site. For reasons detailed herein, I expect that many animals use the section of the Schabarum Skyline Trail that passes through the project site (i.e., Draper Road) and that continues along the eastern side of Hacienda Boulevard. A current, credible study of wildlife movement through the area, including wildlife camera data, is needed.



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Additional data provided by CPAD, 2018; Los Angeles County, 2018.

BLA Fig. 10 Wildlife Corridor 20200601



## Connectivity/Wildlife Movement Issues of Concern for the Project

The following connectivity/movement issues are of concern with respect to the proposed Project:

- Substantial reduction of the Corridor's width at a location already recognized as a crucial chokepoint (LSA Associates 2007:74).
- Loss or severe compromise of Draper Road – one of only two viable pathways for the movement of terrestrial wildlife through the existing chokepoint.
- Degradation of the Corridor's integrity and functionality through increases in vehicle traffic, human activity, lighting, noise, and non-native plants associated with this project.
- Degradation of existing, undisturbed oak woodlands and other natural communities through construction and operation of a new multi-purpose trail.

Elliott and Stapp (2008) conducted roadkill surveys in the Corridor between July 2004 and June 2007, and found that vehicle-strikes were highest on Harbor Boulevard, followed by Colima Road and then Hacienda Boulevard.

Given severe constraints posed by topography, dense vegetation, and existing development in the project vicinity (*cf.* LSA Associates 2007:53), the most viable option for terrestrial wildlife moving through the chokepoint appears to involve crossing South Hacienda Boulevard at grade – with risk of vehicle-strikes – using the route shown in Figure 2, below.



**Figure 2.** View, facing west, showing that, due to steep terrain and extensive existing development, terrestrial wildlife moving east/west across Hacienda Boulevard likely makes heavy use of Draper Road and the segment of the Schabarum Skyline Trail that runs along the east side of Hacienda Boulevard (red line). *Source: Google Earth Pro.*



Figure 3, below, shows the only other viable location for wildlife to cross Hacienda Boulevard, south of the project site at Skyline Drive.



**Figure 3.** View, facing west, showing the only other viable location for wildlife to cross Hacienda Boulevard, at Skyline Drive, 0.6 mile south of the project site. Unlike the route that passes through the project site, this route requires animals to use paved, public roads to pass from one area of low-density residential development to another. Both routes require wildlife to negotiate Hacienda Boulevard at grade. *Source: Google Earth Pro.*

**Rather than examining the only two known/expected pathways for wildlife through this known chokepoint, and evaluating how removing the seemingly more viable of the two would impact wildlife populations throughout the Corridor and wider region, Appendix B-1 fails to identify Draper Road as a likely movement pathway, at all** (see Figure 10, reproduced on page 4 of this letter). The muddled analysis of “Connectivity Features” on page 40 of Appendix B-1 discusses issues of limited relevance, referring to old studies that did not focus narrowly on evaluating wildlife movement through the project site. For example:

... Haas and Crooks (1999) found that use of the Hacienda Boulevard underpass adjacent to the project site was limited to raccoons and cats (*Felis catus*), while documentation of coyotes and other species on either side of the Boulevard suggested surface crossings. The study found that a more widely used crossing point was located at the intersection of Hacienda Boulevard and Skyline Drive, just south of the underpass. The study concludes that the underpass’ limiting factors for native species included high dog (*Canis lupus familiaris*) activity in the area as well as lack of fencing and natural cover leading to the underpass.

Given the potential importance of the project site—a recognized chokepoint—for maintaining the viability of wildlife populations throughout the entire Corridor, it is insufficient to cite a 1999 movement study that covered all of the Chino-Puente Hills, and that does not thoroughly evaluate or analyze wildlife movement issues at Hacienda Boulevard. Consider, for example, the Initial Study’s explanation for low wildlife use of the tunnel under Hacienda Boulevard (see quote from Appendix B-1 at the bottom of the previous page of this letter). The Initial Study gives no indication that the undercrossing has a comically poor design, even for human use (see Photos 1 and 2, below).



**Photo 1.** From the west side of Hacienda Boulevard, any would-be user of the pedestrian tunnel must first ignore the at-grade crossing option and choose to walk down a narrow, 90-foot-long, concrete-sided ramp (at right in this photo) that does not appear to lead to the east side of the road. There is no intuitive reason to expect most animals (or humans) to choose the ramp.

*Photo: R. Hamilton, 11-21-20.*

**Photo 2.** At the bottom of the ramp shown in Photo 1, the would-be tunnel user makes a hard left turn and encounters a pitch-black, narrow-walled space with only a dot of daylight visible far in the distance. I saw no wildlife tracks in the dirt at either end of the tunnel. Seemingly designed to repel any and all potential users, the tunnel serves no useful function at present.

*Photo: R. Hamilton, 11-21-20.*



Examining the pedestrian tunnel for myself, I immediately perceived why very few animals, or people, would ever use this bizarre “connectivity feature,” under any circumstances. There is no intuitive impetus to choose to walk down the long, narrow, concrete-sided entry ramp that runs parallel to the road, then make a sharp turn at the bottom to enter a very dark, narrow-sided tunnel with only a small point of light visible at the other end. As shown in Photo 1, above, it is much more intuitive to simply cross Hacienda Boulevard at grade, despite the risk of a vehicle-strike.

The rest of Appendix B-1 provides no useful data or insights into wildlife movement through the area, and no consideration of how the proposed actions on this project site could potentially impact wildlife populations throughout the Corridor at large. See, for example, this statement on page 40:

While some species may use the Hacienda Boulevard underpass, as noted above, those that are (a) easily deterred by higher levels of human activity and presence of domestic pets, or (b) are less likely to use an underpass to access habitat patches across movement obstacles (such as roads), would likely find other valuable connections in the larger areas of native habitats in the Puente Hills SEA, utility corridor, and Arroyo San Miguel Open Space to the south of the project site.

Two viable routes seem to exist for terrestrial wildlife to traverse Hacienda Boulevard — the at-grade crossings at Skyline Drive and Draper Road. Wildlife moving east/west through the Corridor would not “likely find other valuable connections” across Hacienda Boulevard in the places named above, or anywhere else. The EIR’s analysis of habitat connectivity and wildlife movement issues must be based upon a thorough, current, and credible wildlife movement study that includes the use of wildlife cameras throughout the year. The mitigation measures proposed to address any potentially significant impacts must fully compensate not only for the direct loss of what is presumably a critically important movement route, but for various development-related “edge effects” that would accompany project implementation.

### **Potential Mitigation for Movement/Connectivity Impacts**

For reasons discussed previously, the proposed project can be expected to entail potentially significant impacts to the wildlife movement and habitat connectivity in an already-constrained area recognized as being critically important to maintaining the long-term viability of wildlife populations throughout the Corridor. The new, half-mile-long, multi-purpose trail proposed to be established in the southern part of the project site would significantly impact undisturbed, ecologically sensitive oak woodlands, streambeds, and other natural communities. The impacts would result from a) bringing humans and pets into an area that is currently secluded and essentially inaccessible due to steep topography and dense vegetation; b) soil compaction; c) future erosion of the trail that would be cut into steep topography; and d) direct removal of habitat.

Although the new trail, depicted on Figure 4 on the next page, would provide terrestrial wildlife with a viable alternative to the Draper Road route, which would be lost, simply installing the new trail would not compensate for the project’s impacts to wildlife movement and habitat connectivity. This is because the loss of the existing, unconstrained movement route would be accompanied by a substantial reduction in width of an already-too-narrow chokepoint, plus all of the other forms of “edge effects” described previously, each of which has potential to adversely affect wildlife movement and to contribute to habitat fragmentation and degradation.





**Figure 4.** View, facing west, showing the proposed new multipurpose trail in the southern part of the project site (orange line). The dysfunctional existing pedestrian tunnel under Hacienda Boulevard is shown in light blue. The existing trails east and west of the site are shown in white. *Source: Google Earth Pro.*

To compensate for the project's significant impacts to wildlife movement and habitat connectivity, the PHHPA is recommending that the applicant consider, as a minimum measure, "the installation of a wildlife overpass, or significantly retrofitting the current pedestrian tunnel beneath Hacienda Boulevard into a wildlife-appropriate crossing structure to encourage safe wildlife passage." **I strongly support this recommendation, and agree with the PHHPA that it represents a *minimum* measure.** In addition to retaining an experienced specialist to design a wildlife overpass or properly retrofitted pedestrian tunnel, I further recommend the following additional mitigation measures, which would be required to establish a reasonably secure wildlife movement linkage across Hacienda Boulevard in this heavily constrained chokepoint in the Corridor.

### **Restoration of Appropriate Native Communities Along Trail**

As shown in Photo 1 on page 6 of this letter, the entrance to the pedestrian tunnel on the west side of Hacienda Boulevard is barren and uninviting to wildlife. Photos 3–8 on the following pages show that habitats are also barren and/or degraded on the east side of the road, including on the property of the existing Hsi Lai Temple. A necessary mitigation measure would be to plant appropriate oak woodland and other locally native plantings in these areas, to provide cover for vulnerable wildlife moving through this degraded, but geographically important, area.





**Photo 3.** The entrance to the pedestrian on the east side of Hacienda Boulevard is barren and uninviting to wildlife. If and when the underpass is retrofitted, appropriate native plantings should be provided near both entrances.

*Photo: R. Hamilton, 11-21-20.*

**Photo 4.** A short distance south of the entrance to the tunnel on the east side of Hacienda Boulevard, the edges of the trail should be restored with appropriate native plantings to provide cover for wildlife attempting to move through the area. The non-native peppers should be replaced with oaks, walnuts, etc.

*Photo: R. Hamilton, 11-21-20.*



**Photo 5.** To help compensate for the proposed major reduction in the width of the Corridor for the new project, this large, barren slope on the property of the existing Hsi Lai Temple should be restored with appropriate native plantings. *Photo: R. Hamilton, 11-21-20.*





**Photo 6.** This dense stand of bamboo is starting to spread from the grounds of the existing Hsi Lai Temple into the adjacent seasonal creek bed. This exotic plant, which provides little value to native wildlife, especially in a movement corridor, should be removed and restored with appropriate native plantings. *Photo: R. Hamilton, 11-21-20.*

**Photo 7.** Dense stand of exotic bamboo spreading from the Hsi Lai Temple property into the adjacent creek bed, where it is growing next to a native sycamore tree. *Photo: R. Hamilton, 11-21-20.*



**Photo 8.** Various other exotic plants growing along the eastern trail, such as this Spineless Yucca, should be removed and the area restored with appropriate native plantings. *Photo: R. Hamilton, 11-21-20.*



## Installation of Wildlife Fencing Along Hacienda Boulevard

Together with provision of an overcrossing, or retrofitted undercrossing, wildlife fencing should be added along the shoulders of Hacienda Boulevard to prevent vehicle-strikes and to guide wildlife to the safe crossing (Spencer 2005, LSA Associates 2007).



**Photo 9.** Addition of wildlife fencing along Hacienda Boulevard would be another useful compensatory measure, so long as an overcrossing or retrofitted undercrossing is provided. *Photo: R. Hamilton, 11-21-20.*

## DEIR Must Fully and Accurately Describe the Surrounding Land Use

That the project site is located within a Significant Ecological Area (SEA) is highly relevant to the CEQA analysis, regardless of whether or not the associated ordinance applies to the proposed project. Close by the project site, to the southwest, the PHHPA has restored, or is in the process of restoring, 91 acres of coastal sage scrub that now provide some of the most valuable and biologically productive habitat anywhere in the Corridor. The DEIR's analyses must carefully and credibly evaluate the effects of implementing this project in this environmentally sensitive and vulnerable location—a recognized chokepoint, further degradation of which would threaten the overall integrity and function of the larger Corridor. The County of Los Angeles must require that the applicant undertake every measure needed to avoid and minimize impacts to the local ecosystem, and to the Corridor at large.

## All Landscaping and Fuel Modification Plantings Should be Locally Native

I strongly support PHHPA's recommendation to limit all plantings on the project site to appropriate native plant species known to naturally occur in the surrounding area and approved for fuel modification zones. The width of the Corridor is already highly constrained in the project vicinity, and the proposed actions will reduce the chokepoint's width still farther, so all measures should be taken to mitigate these adverse effects on native plants and wildlife, including invertebrates. The strict use of locally native plants will help to achieve this requirement.



## **All Fuel Modification Must be Conducted On-Site**

The project's design must be modified to ensure that all annual fuel clearance shall be conducted within the project site, and not on neighboring properties. It is not acceptable to design a project with biological impacts that would extend outside of the property boundaries onto natural lands administered by the PHHPA, Southern California Edison, or others.

## **DEIR Should Analyze a Viable Project Alternative with Reduced Impacts**

The Draft EIR should evaluate a viable project alternative that clusters development in the northern half of the project site, and that eliminates the southbound exit from the project site. This would avoid reducing the width of the existing "chokepoint" any more than necessary to meet the project's basic objectives.

## **DEIR Should Use High-quality, Aerial-based Graphics**

As shown on page 4 of this letter, Appendix B-1 in the Initial Study uses semi-opaque color screens to depict various land designations and a putative "wildlife corridor" through the project vicinity. The Draft EIR should employ high-quality, aerial-based graphics that allow readers to view the resources under consideration, instead of obscuring the resources beneath screens.

## **CONCLUSION**

I appreciate the opportunity to provide these comments on the Initial Study. I can be reached at (562) 477-2181 or [robb@hamiltonbiological.com](mailto:robb@hamiltonbiological.com).

Sincerely,



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cc: Erinn Wilson-Olgin, California Department of Fish and Wildlife  
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Melanie Schlotterbeck, Hills For All

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