



November 19, 2020

Jolee Hui c/o Ed Rojas (NOP Comments)
County of Los Angeles
Department of Regional Planning
Zoning Permits East Section
320 West Temple Street, 13th Floor
Los Angeles, CA. 90012
jhui@planning.lacounty.gov

Re: Notice of Preparation of a Draft Environmental Impact Report for the Hsi Lai Monastery Site, Project No. 2018-000207-(4)

Dear Ms. Hui:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Hsi Lai Monastery Site (Project) released October 28, 2020. The Board of Directors for the Habitat Authority met on November 19, 2020 and is submitting these comments for your consideration.

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.

In the Puente Hills, the Habitat Authority manages open space owned by itself, the City of Whittier and Sanitation Districts totaling 3,886 acres (hereafter, referred to as the Puente Hills Preserve) which lie within the Cities of Whittier and La Habra Heights, and the County unincorporated area known as Hacienda Heights. The proposed Project is located in an open space area north of, and adjacent to, the Puente Hills Preserve. It is part of the Puente-Chino Hills Wildlife Corridor, which biologically preserves a microcosm of the California Floristic Province, an identified biodiversity hot spot in North America and a genetic reserve for the continent which makes it regionally and globally significant.

Overall, we are concerned that this Project has the potential to restrict wildlife movement between the Preserve and other adjacent open space, decrease biological diversity, negatively impact resources and habitats used by the federally threatened coastal California Gnatcatcher

A Joint Powers Agency created pursuant to California Government Code §6500 *et seq.*
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and other wildlife, and result in negative edge effects on adjacent conserved open space that will deteriorate the quality of the habitat over time.

As currently designed, we recommend for consideration that a minimum measure to mitigate for adverse impacts to the wildlife corridor be 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.

Our full comments are attached in Exhibit A.

Thank you for your consideration of our comments on the NOP. Feel free to contact me or Andrea Gullo, Executive Director, at (562) 945-9003 or agullo@habitatauthority.org for further discussion. Also, please maintain our agency on the contact list for this planning process.

Sincerely,



Mike Hughes
Chair

cc: Board of Directors
Citizens Technical Advisory Committee

Exhibit A
Comments on Notice of Preparation of a Draft Environmental Impact Report for the
Hsi Lai Monastery Site

Brief Project Description

The International Buddhist Progress Society proposes the development of a monastery retreat center with associated accessory uses, Hsi Lai Monastery Site (Project). The proposed Project would involve the development of 17 buildings concentrated on the northern portion of the site (APN 8240-036-021). The remaining portion of the site (APN 8291-035-020) would remain undeveloped except for new landscaping and walkways. The project would include two proposed driveways along South Hacienda Boulevard, and a new multi-purpose public trail would be developed along the southeasterly portion of the site as part of the project. 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.

Detailed Comments on the NOP are as follows:

The Initial Study did not fully describe the surrounding land use and setting.

This section of the DEIR should acknowledge that the Project is located within a County designated Significant Ecological Area (SEA), regardless of whether the associated ordinance applies to the Project or not. Also, please add in the DEIR that directly adjacent and southwest of the Project, within the City of Whittier, City of La Habra Heights, and Hacienda Heights, is the Puente Hills Preserve which is designated as a County SEA. Please see the attached map for reference (Figure 1). The Preserve exists to maintain and restore what remains of native grasslands, coastal sage scrub, riparian scrub, and oak woodland and associated wildlife communities that existed in abundance in the past but are now rare. The Puente Hills are among the last known habitats in the Los Angeles area for animals that are considered California Species of Special Concern, special status species, and/or that are nearly extinct in the Los Angeles area. The Habitat Authority has facilitated restoration and enhancement on over 300 acres of habitat across the Preserve; immediately southwest of the proposed project site, 71 acres of coastal sage scrub has been restored and another 20 acres is currently being restored specifically to benefit the federally threatened coastal California Gnatcatcher as mitigation for development elsewhere.

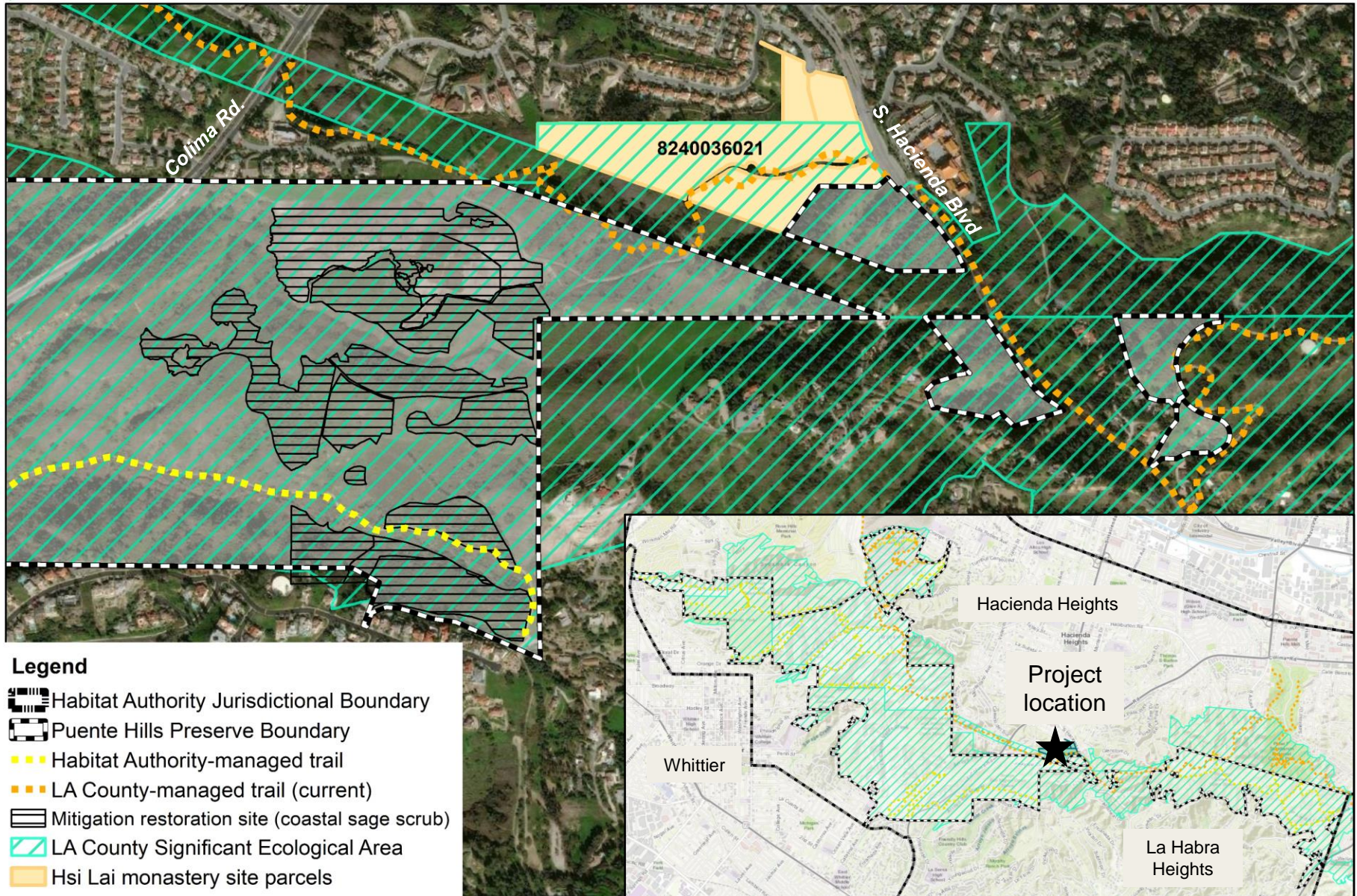
As a global comment, the maps in the DEIR that indicate land owned and managed by the Habitat Authority should say "Puente Hills Preserve", not "Arroyo San Miguel Open Space" or some other label.

Additionally, the proposed Project is located within the well-studied Puente-Chino Hills Wildlife Corridor which is widely recognized as being regionally important for wildlife movement (Conservation Biology Institute 2005, and citations therein).

**Figure 1. Puente Hills Preserve and vicinity
Los Angeles County**

Created: November 2020

0 0.125 0.25 0.5 Miles



Covering more than 30,000 acres of land, this wildlife corridor boasts a wide variety of habitats that support a unique assemblage of plants and animals. This corridor also serves several ecological functions that contribute to ecosystem health, including water infiltration; nutrient cycling; and carbon sequestration. The corridor provides landscape-scale connectivity for wildlife between open space parcels; hunting and foraging grounds; cover and shelter; breeding grounds; and safe passage and refugia in the event of large disturbances such as wildfires. Maintaining large swaths of undeveloped open space increases species diversity and buffers against edge effects caused by bordering developments, such as light, noise, and disturbance that affect natural communities. Connectivity among open space maintains the transfer of genetic material among generations of plants and animals, ensuring healthy and sustainable populations.

Environmental Impacts Checklist:

Section 4. Biological Resources

a) Special status species: *The DEIR needs to fully explore the impacts to protected species and offer avoidance and mitigation measures.*

We agree with the NOP that the proposed Project has the potential to significantly impact protected and special-status species and their associated habitats. Of particular concern are impacts to the coastal California Gnatcatcher and coastal sage scrub vegetation communities as this Project is within the United States Fish and Wildlife Service's designated Critical Habitat for that species. Consultation with USFWS will be necessary to mitigate potential adverse impacts to this species and its critical habitat resulting from construction of the Project and maintenance of the fuel modification zone surrounding the site.

Although coastal California Gnatcatcher were not detected during protocol surveys conducted by the Project Applicant's biological consultant (Appendix B-1 of the Initial Study), we believe that there is potential for this species to occur onsite given the presence of approximately 4.08 acres of mapped sagebrush scrub as well as the site's proximity to recent occurrence records. Habitat Authority biological consultants have documented coastal California Gnatcatchers in restored coastal sage scrub habitat within 0.2 miles of the boundary of the Hsi Lai's APN 8240-036-021; the most recent records adjacent to this parcel were a family group in June 2020 and two separate pairs in April 2020. Coastal California Gnatcatchers have also been documented occurring southeast of the Project site. Patches of coastal sage scrub habitat, such as occurs on the proposed Project site, may act as critically important "stepping stones" for gnatcatchers dispersing between these adjacent open spaces.

Impacts to sensitive species with potential to occur on the Project site such as bats, not just those documented as present, need to be evaluated, avoided or/and mitigated in the DEIR. The NOP and Preliminary Biological Constraints Analysis for the Project (Appendix B-1 of the Initial Study) notes the presence of several special status wildlife and plant species within the Project area; however, several other special status species have also been noted near the Project area. For example, 11 species of bats occur on the Puente Hills Preserve of which several are special status species: pallid bat (*Antrozous*

pallidus), western mastiff bat (*Eumops perotis californicus*), hoary bat (*Lasiurus cinereus*), western yellow bat (*Lasiurus xanthinus*), Yuma myotis (*Myotis yumanensis*), and pocketed free-tailed bat (*Nyctinomops femorosaccus*) (Remington 2006). According to Appendix B-1 of the Initial Study, only two of those bat species were deemed to have “low potential for occurring on the project site” and the other species were deemed to have “no potential to occur”. Many other species were identified as “not occurring within 5 miles of the project site” or “not expected to occur”, however those species have also been documented as occurring on the Preserve, the boundaries of which are within 5 miles of the project site. Please refer to the Preserve’s Resource Management Plan (LSA 2007, Appendices) for lists of species that occurred on the Preserve at the time that Plan was written; please note that the lists continue to be expanded upon as new occurrences are recorded.

Impacts to special status bird species from the proposed Project should be examined beyond just physical habitat removal or disturbance to nesting activities.

The proposed project has the potential to permanently alter the dynamics and composition of the bird community in this area. With few preserved and undisturbed areas remaining, displaced birds (and other wildlife) will be forced to compete with existing populations in other areas, possibly reducing their numbers or restricting their range in the Puente Hills. The potential for such substantial adverse impacts needs to be fully evaluated and mitigated.

The DEIR and accompanying conditions of approval should require that all annual fuel clearance be restricted to remain within the project site so as to not impact additional vegetation which contributes to the available natural area for these sensitive species. As currently presented, the project’s fuel clearance would need to be conducted on Southern California Edison property to be compliant with County regulations. The design as presented reduces the buffer area from disturbance between the Project and the Puente Hills Preserve contributing to more edge effects.

b) Riparian habitat or sensitive natural communities: *The DEIR should fully analyze impacts to riparian habitat or other sensitive natural communities, such as coastal sage scrub vegetation, and offer appropriate avoidance strategies or mitigation.*

We agree with the NOP that the Project has the potential to have a substantial adverse effect on riparian habitat or other sensitive communities. Nine vegetation communities and one land cover type were identified on-site, including 4.08 acres of California sagebrush scrub. Exactly how many acres of each mapped vegetation community will be impacted by the proposed Project needs to be stated in the DEIR. It appears that the majority of the sagebrush scrub onsite will be impacted by the Project footprint, proposed trail, and fuel modification zone. As previously mentioned, the Project is within designated critical habitat for coastal California Gnatcatcher, a federally listed species, and impacts to sagebrush scrub need to be evaluated and mitigated within this context.

c) State or federally protected wetlands: *The DEIR should fully analyze impacts to state and federally protected wetlands and offer appropriate avoidance strategies or mitigation.*

We agree with the NOP that the Project has the potential to have a substantial adverse effect on state or federally protected wetlands. The proposed recreational trail traverses Drainage 1. The DEIR should consider an alternative that eliminates this new trail as it has the potential to negatively impact at least 16 oak trees as well as a blue line stream necessitating a Streambed Alteration Agreement with the California Department of Fish and Wildlife.

d) Wildlife corridor impacts: *The DEIR should fully evaluate the Project's potential to interfere with the movement of wildlife species and impacts to established native resident or migratory wildlife corridors (such as the Puente Chino Hills Wildlife Corridor) and offer appropriate avoidance strategies or mitigation such as installing a wildlife overpass, or significantly retrofitting the current pedestrian tunnel beneath Hacienda Boulevard into a wildlife-appropriate crossing structure to encourage safe wildlife passage.*

The DEIR should require a camera and track-based wildlife movement analysis prior to and after construction to monitor the effectiveness of the improved road crossing.

We agree with the NOP that the Project has the potential to interfere substantially with the movement of native resident or migratory wildlife species or with established native resident or migratory wildlife corridors. As previously mentioned, the Project site is located within the Puente-Chino Hills Wildlife Corridor. Due to topography and current levels of development in the vicinity of Hacienda Boulevard, this area is the narrowest stretch of the wildlife corridor (CBI 2005) and a particular concern is that the proposed Project will impact landscape connectivity for wildlife by further constraining the linkage between open space. In order for a corridor to maintain its function, it not only needs to provide physical space for wildlife to move through but also needs to support the elements necessary for individuals or groups to persist over time to maintain connections between populations and promote genetic exchange and diversity. As part of a larger study conducted on the Puente Hills Preserve, the United States Geological Survey radio-collared two bobcats and the resulting telemetry data revealed that the male bobcat crossed S. Hacienda Boulevard on several occasions during January – May 2013, using paths that traversed the Project site and adjacent parcels (USGS 2013; Figure 2). This highlights the importance of these parcels for facilitating wildlife movement within the corridor across Hacienda Boulevard for medium and large bodies mammals, presumably owing to the canyon topography of the Project site being a natural movement path. Mule deer are also frequently observed by Habitat Authority staff on either side of Hacienda Boulevard in this area and presumably cross the road when traffic volumes are low. There is no evidence that coyotes, foxes, deer or bobcats use the existing recreational trail tunnel under Hacienda Boulevard despite their occurrence in the vicinity (Haas 2000, Haas and Crooks 1999) most likely because it was not designed for wildlife use. **Given the various factors outlined above, this area of Hacienda Boulevard has been identified as a priority for improvement to, or addition of, crossing structures to benefit wildlife movement (CBI 2005).**

Figure 2. GPS collar data for individual male bobcat traversing the Puente Chino-Hills Wildlife Corridor (January-May 2013)

Path lines connecting consecutive pairs of locations collected less than 60 minutes apart. White asterisk indicates a location that may have particularly poor spatial accuracy.

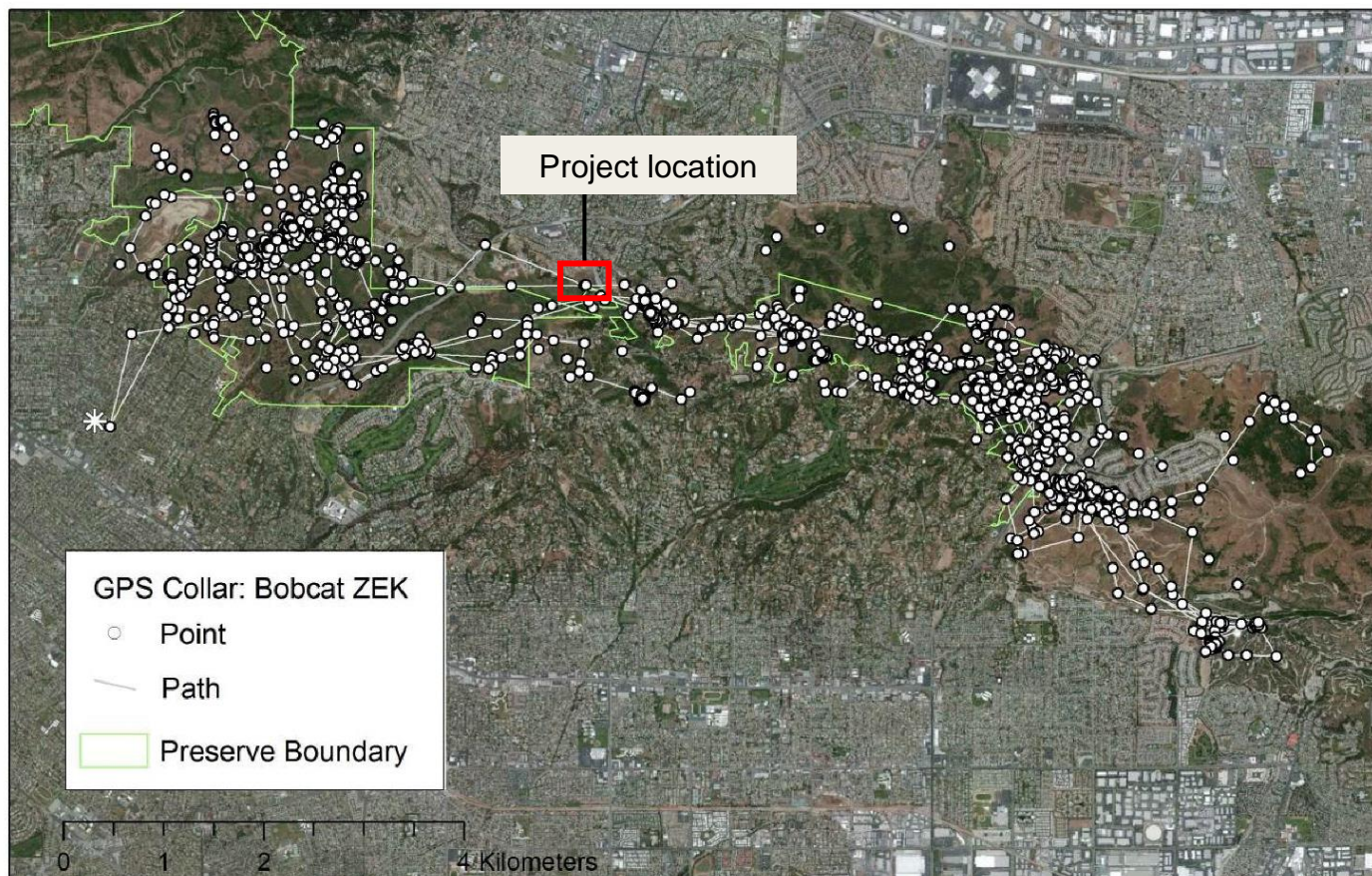


Figure adapted from United States Geological Survey. 2013. Assessment of human impacts on habitat and connectivity for the conservation of bobcats and other wildlife in the Puente Hills. Year 1 report. (Figure 5)

The DEIR needs to evaluate the effect of increased traffic volume resulting from the Project, including the reduced potential for successful wildlife crossings both directly (via road mortality) and indirectly (via avoidance caused by increases in associated traffic noise; Shannon et al. 2015) and potential increases in wildlife-vehicle collisions especially at night that could result in human injury or loss of life. The proposed Project daily vehicular trips added to Hacienda Boulevard (448 daily trips) will create a significant negative impact on wildlife movement and needs to be mitigated. Please consider in the DEIR and accompanying conditions of approval the limitation or prohibition of all nighttime vehicle travel southbound on Hacienda Boulevard that this Project would generate.

The DEIR needs to evaluate the impacts to wildlife movement through this area as a result of the proposed fencing, including evaluation of a “no fencing” alternative. According to Figures 3 and 4 (pages 7 and 11, respectively) of the Initial Study, it appears that the boundaries of the site will be fenced. Information regarding whether the boundaries are currently fenced and the fencing type should be accurately described in the DEIR.

The DEIR should fully analyze lighting, noise and night activity from both the project site and new trail on wildlife behavior and movement and offer appropriate avoidance strategies or mitigation. Additionally, special events should not be allowed beyond 7pm (the Initial Study indicates that special events may end at 10pm) as this could have significant negative impacts on wildlife movement. The Habitat Authority is concerned not only about the direct impacts from project construction but also from indirect “edge effects”, such as noise and lighting, which will extend far beyond the physical boundaries of the developed site and proposed trail. Currently, these edge effects are mostly confined to the existing northern edges of the Project site adjacent to developed areas and the current access road/County trail. However, the proposed Project, its associated fuel modification zone, and the new trail will extend edge effects onto the Preserve. Noise and artificial light impacts can cause wildlife to avoid certain areas, reducing their overall habitat available for daily activities, as well as for movement and dispersal. Noise impacts can also cause stress, resulting in decreased health and breeding success, and sometimes resulting in nest abandonment by birds.

The DEIR should fully analyze how the proposed trail will impact wildlife behavior, including a thorough examination of available scientific literature that have studied recreational impacts to wildlife, and offer appropriate avoidance strategies or mitigation. Regular use of the new trail by recreationalists has the potential to substantially negatively impact wildlife and their movement through this area. Currently, no parking is available for recreationalists to access the County trail in this area; the additional parking spaces provided by the proposed Project will increase use of this area beyond current levels and improve ease of access during the hours between dusk and dawn when wildlife may be particularly active.

e) Oak woodland impacts: *The DEIR should fully evaluate the Project’s impact to individual oaks and oak woodlands and offer appropriate avoidance strategies or mitigation.*

According to the Oak Tree Report (Appendix B-2 of the Initial Study), of the 167 oak trees within the survey area, approximately 70 trees are on Habitat Authority managed land, indicating that roughly 42% of the potentially impacted oak woodland extends onto a neighboring parcel that is designated as a County SEA. Additionally, two 30-foot tall oak woodland trees (#100 and #103) occurring on Habitat Authority managed property will be encroached upon with the construction of the Project's nature trail. *The DEIR needs to present an alternative that does not encroach upon Habitat Authority protected trees, including rerouting the trail further away from the Preserve boundaries.*

Mitigation for oak impacts proposed in the Oak Tree Report include a) a four foot protective fence be placed around the trees, b) the trees would be monitored for two years for mortality, and replaced at a ratio of 2 to 1 if they die, and c) any excavation or grading allowed within the tree protective zone would be limited to hand tools or small hand powered equipment. *Please consider monitoring all impacted and replacement trees for 7-10 years rather than the inadequate two-year monitoring period outlined in the Oak Tree Report. Also, because the proposed Project will impact an intact oak woodland, we strongly suggest mitigating those impacts at ratio of 5 to 1 as a more accurate compensation. Also, the DEIR needs to explain how construction of the proposed new nature trail could be accomplished via the proposed methods intended to avoid impacts to oak trees (e.g., using only hand tools). Additionally, the DEIR needs to address degradation of this intact oak woodland over time resulting from maintenance of the new trail in perpetuity and recreational use.*

The proposed Project and DEIR needs to address all alternatives that do not involve accessing Habitat Authority managed lands. Permission was not requested nor granted to enter onto Habitat Authority property, conduct a survey, and affix physical identification tags onto the surveyed oak trees. These actions directly violated the ordinance that governs the property. The Project Applicant currently does not have permission to encroach on or access Habitat Authority property. The Project should be designed in such a way that access to neighboring parcels is unnecessary.

Please have the DEIR evaluate accurate impact ratios to oaks found on the Project site. According to Figure 3 in the Oak Tree Report, only 53 of the 167 trees surveyed (which includes the approximately 70 on Habitat Authority property) are within the Project site west of Hacienda Boulevard. Of those 53 trees, six (11%) would be removed and 16 (30%) would be encroached upon, resulting in a combination of impacts to 41.5% of onsite oak trees.

Please have the DEIR evaluate and offer mitigation for annual disturbance to the currently intact oak woodlands as a result of fuel modification activities including impacts to the natural recruitment of oak trees, type-conversion to disturbance-following plant species, and ecosystem-level impacts such as to nutrient cycling.

Section 11. Land Use and Planning

b) Conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect:

We disagree with the finding that that the project will cause a less than significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. *Please reevaluate this finding in the DEIR. Also, please consider in the DEIR analysis the potential conflicts of the proposed Project with the below plans, policies or regulations:*

The land use designation for the site is RL2 (Rural Lands 2- Maximum one dwelling unit per every two acres). Over a 29 acre-site that would equate to 14.5 dwelling units, but the project description calls for 17 buildings. The County General Plan Policy LU 6.3 encourages low density and low intensity, however given the above information and that the new project would also result in 19 acres of impervious surface, the project does not appear to meet this policy.

The County General Plan Policy C/NR 1.5 requires access to dedicated open space to consider sensitive biological resources. The Checklist analysis mistakenly said that the proposed reroute of the Schabarum Trail would connect to an “Arroyo San Miguel trail” which is not the case. The Schabarum Trail does not connect to other trails in this area. Also, the proposed trail, as mentioned in the Biological Section, would create impacts to the environment in its construction and use, thus degrading rather than preserving their ecological value.

The County General Plan Policy S 3.7 requires developments to be designed to reduce wildfire risk. The Checklist analysis stated that a fuel modification plan has not yet been created. In the DEIR, please fully analyze the safety risk as it appears from the maps in the Initial Study that the necessary vegetation clearance of 100 to 200 feet around all buildings may not be achieved within the project site.

The Hacienda Heights Community Plan Policy LU 3.2 encourages dedication of open space or trails to a public land preservation agency such as the Habitat Authority. The Project offers creation of a new trail in coordination with the County to be managed by the Project applicant. Please include in the DEIR analysis for dedication of undisturbed open space given the biological sensitivity of the Project site location.

The Hacienda Heights Community Plan Policy LU 4.1 requires minimized alteration of the hillside caused by development. The provided analysis states that the project is designed to minimize grading and impacts to the site, however, it is also stated (analysis for Policy LU 4.2) that the exact amount of grading has not yet been determined for the project. We feel there is insufficient information to determine consistency of the Project with this Community Plan policy.

The Hacienda Heights Community Plan Policy LU 4.3 requires locating new structures off the top of a ridgeline to preserve undeveloped ridges. The analysis states that the proposed buildings would be nestled into the hillsides and blend with the site topography to preserve ridgeline views, however it is also stated that planted trees will be placed along the northern edge of the project site to ensure the growth of a full tree-lined

canopy and further limit visibility of the Monastery buildings which implies that ridgeline views will be buildings that are screened.

The Hacienda Heights Community Plan Policy LU 4.4 encourages architectural styles and design that are compatible with the natural landscape in hillside areas. The analysis states that the smaller buildings to the west of the project site would be broken down into smaller building blocks to minimize the grading footprint and provide maximum amount of undisturbed open space, however, while smaller buildings may decrease the total cubic yards of grading required, it increases the square footage of surface area and habitat disturbed, increases the footprint of the development, and thus increases the fuel modification zone. It also spreads human edge effects farther to the west, potentially impacting wildlife and introducing invasive vegetation farther into the Preserve.

The Hacienda Heights Community Plan Policy LU 5.5 restricts the intensity of development in areas with hazards. We agree with the analysis that the proposed project would intensify land uses on the project site, which is mostly undeveloped. However, the analysis also states that the “programed square footage for the project is divided into 17 buildings, which are small to medium in scale and massing. The provision of multiple buildings of smaller massing permit the project to place the buildings within existing hillsides and topography, and reduce the amount of overall grading required to accommodate the project”, which does not address the Project’s consistency with the Community Plan Policy as it relates to hazards. Breaking a very large project – 138,353 square feet – out over several buildings (17 in total) to fit topographical constraints will result in a Project that is still just as susceptible to burning in a wildfire and collapsing in a landslide.

The Hacienda Heights Community Plan Policy OS 1.2 promotes new trail connections and trailheads if they do not conflict with open space management, safety and biological issues. A new trailhead that is not closed outside of regular use hours and not staffed will invite undesirable afterhours activity. Unsupervised illegal access at night could create a public safety concern and wildfire risks to adjoining properties. Other open trail access points in the area attract illegal behaviors afterhours such as smoking, homeless encampments, new undesignated trails, alcohol use, and firework ignition. Additionally, moving the Schabarum Trail off its current alignment to remove hikers and cyclists from the proposed monastery driveway is the option with the highest impacts. The current trail alignment is completely outside the oak woodland and preserves the integrity of the woodland. A new trail in the oak woodland will subject the woodland to extensive soil compaction and potential other damage, such as increased trail width over time and erosion from improper trail use.

The Hacienda Heights Community Plan Policy C1.4 requires structures to be designed to minimize the extent of fuel modification zones and degradation of locally indigenous vegetation. We disagree that the Project is currently designed in such a way that minimizes impacts to the site or preserves existing vegetation communities. Additionally, it appears from the maps in the Initial Study that the necessary vegetation clearance of 100 to 200 feet around all buildings may not be achieved within the project

site and will impact oak woodlands, which indicates that the Project is not designed in such a way as to minimize the extent of the fuel modification zone.

The Hacienda Heights Community Plan Policy C 2.1 ensures continuity of wildlife corridors. The potential for significant adverse impacts to the wildlife corridors has already been explained in the Biological section of this letter. Additionally, it is not clear how the existing plant communities in the southern portion of the project site will be enhanced as part of the project, aside from the oak tree plantings that will be required for Project impacts.

Please have the DEIR reevaluate all Policies of the County General Plan and Hacienda Heights Community Plan especially with the ones mentioned above for compatibility adjacent to a Significant Ecological Area, the Puente Hills Preserve.

Please have the DEIR evaluate the potential conflict of the project with regulations that avoid or mitigate an environmental effect. The Habitat Authority is facilitating habitat restoration on the Puente Hills Preserve in the City of Whittier immediately west of this project. This habitat restoration is satisfying mitigation measures for impacts to the environment and is regulated by the United States Fish and Wildlife Service. The proposed project has the potential to denigrate that mitigation, the purpose of the Puente Hills Preserve, and wildlife corridor.

Section 15. Public Services

We respectfully disagree with the findings in the Checklist that there would not be potentially significant impacts to other public services. Draper Drive has been a long-established access point for the hills. The Project as designed may have adverse impacts to the Habitat Authority, a local government agency, that has used Draper Drive for over 20 years to access its Preserve and conduct federally regulated habitat mitigation restoration on neighboring parcels. Additionally, our rangers who are law enforcement and wildland fire fighters use this access point to keep the hills safe for the community. The elimination of the access road as proposed would prevent us from providing valuable public services and public safety for the area.

Section 16. Recreation

b) Recreational facilities: *The DEIR needs to analyze all measures that that can be taken to avoid or minimize adverse disturbance to the physical environment, including 1) the elimination of the requirement to reroute the existing trail that has been in place for nearly 50 years, and 2) elimination of the new unstaffed trailhead.*

We agree with the NOP finding that there is the potential for significant impacts to the environment, including to the intact undisturbed oak woodland and wildlife movement, as a result of the construction of recreational facilities. Currently, no parking is available for recreationalists to access the County trail in this area; the additional parking spaces provided by the proposed Project will increase use of this area beyond current levels and improve ease of access during the hours between dusk and dawn when wildlife may be particularly active. As mentioned in Section 11 (Land Use and Planning) in this letter, a new trailhead that is not closed outside of regular use hours and not staffed will invite undesirable afterhours activity. Unsupervised illegal access at night could create a

public safety concern and wildfire risks to adjoining properties as well as to the proposed Project. Other open trail access points in the area attract illegal behaviors afterhours such as smoking, homeless encampments, new undesignated trails, alcohol use, and firework ignition.

Alternatively, should the trail need to be rerouted, to minimize impacts please have the DEIR consider a reroute from an access point in the northern portion of the Project site within areas that are already subject to edge effects from existing development. This would significantly reduce impacts to the intact oak woodland and prevent associated edge effects from expanding onto adjacent parcels that are not owned or managed by the Project Applicant. However, the existing trail route is preferred.

As a global comment for the DEIR, please correct all references to local trail connections. The existing trail on the project site is Los Angeles County's Schabarum Trail, which is also the National Park Service Juan Batista De Anza Historical Recreational Route. This trail does not directly link with Habitat Authority trails until it reaches Turnbull Canyon in the west or Powder Canyon in the east. Incorrect references were repeatedly made throughout the Initial Study and Checklist that the Project trail connected to the "Arroyo San Miguel trail network". Please accept this as a comment for the entire DEIR that this project does not connect to trails in the Arroyo San Miguel Canyon area.

Section 17. Transportation

b) Conflict or inconsistency with CEQA Guidelines section 15064.3, subdivision (b): *The DEIR needs to elucidate the transportation impacts for this Project.*

The DEIR should consider a reduction in the amount of daily vehicular trips added to Hacienda Boulevard (448 daily trips are proposed). The analysis should include consideration for contributing impacts to wildlife movement.

Section 20. Wildfire

We agree with that the Project will have potentially significant impacts in regards to wildfire risk. Adding open unstaffed trailheads and additional structures within a High Fire Hazard Severity Zone adds risk to the area, including adding liability risk to neighbors such as the Habitat Authority. The focus with new laws is on structure materials as playing a critical role in reducing wildfire risks. For more information visit CalFire's website

<https://www.readyforwildfire.org/prepare-for-wildfire/get-ready/hardening-your-home/>

Alternatives:

Please have the DEIR evaluate a No Project and a Low Density Alternative that clusters the development to the north of the project; converts the existing house to a multi-level volunteer house and dormitory combined with subterranean parking; eliminates at least two-thirds of the project buildings; reduces the annual fuel clearance footprint; eliminates the rerouting of the nature trail through intact oak woodlands and wildlife corridor; eliminates the new unstaffed trailhead; eliminates the exit for southbound-only travel on Hacienda Boulevard; and retains a block of undisturbed natural open space to complement adjacent open spaces. These alternatives would help to reduce the project footprint, as well as impacts to the wildlife corridor.

Other comments:

We request that the DEIR address the importance of complementing and enhancing the public investment already made in the region for the benefit of the surrounding community so it does not diminish the ecological value of nearby public open space. There has been considerable public investment in the Puente Hills. The Habitat Authority has received \$64 million of public funds from the Puente Hills Landfill to contribute toward its mission statement. Other public funds include \$17 million from voter-approved Los Angeles County Proposition A for the City of Whittier's use for acquisition in the hills. Other entities have also invested millions of dollars in acquisition and habitat restoration efforts in the Puente Hills Preserve. Overall, at least \$100 million public dollars have been invested into the hills.

The DEIR and accompanying conditions of approval needs to require that the project applicant perform a property survey to delineate their parcel boundaries and clearly mark them before any ground disturbance begins as a guarantee that they do not encroach on the Habitat Authority's adjacent managed property.

We respectfully request that a Project goal to be considered for inclusion into the DEIR is as follows: Enhance, complement, and protect existing natural wildlife movement in the area.

Page 10 of the Initial Study and Figure 4 (pg. 11) briefly describe the landscaping plans for the project site but plant species (other than replacement coast live oaks) are not specified. We strongly recommend that only native plant species known to naturally occur in the surrounding area and approved for fuel modification zones be planted on the project site. Importantly, this will minimize the spread of non-native exotic and potentially invasive ornamental plant species from escaping the Project site onto adjacent conservation and open space lands. Additionally, native species are drought tolerant, locally adapted, will blend in cohesively with the surrounding environment, and will improve resource availability for native invertebrates and wildlife.

References

[CBI] Conservation Biology Institute. 2005 Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor. Prepared by WD Spencer.

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