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September 14, 2021

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Zoning Permits East Section

Attn: Jolee Hui

c/o Ed Rojas (NOP Comments)

320 West Temple Street, 13th Floor

Los Angeles, California 90012

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

Dear Ms. Hui:

The Wildlife Corridor Conservation Authority (WCCA) provides the following Notice of Preparation comments for the above-referenced project. The Puente-Whittier Hills open space complex comprised of public and private land is a regionally-significant biological, visual, and recreational resource. This unique natural area remains tenuously connected to the Chino Hills and the Cleveland National Forest. Much of this natural lands complex, including the project area, is designated Critical Habitat for the coastal California Gnatcatcher by the United States Fish and Wildlife Service.

Conservation biologists in their analysis of population viability parameters have long concluded that southern California habitat areas the size of the Puente-Whittier Hills complex (in particular west of the 57 freeway) are not large enough to sustain viable long-term populations of various medium and large-bodied mammals without adequate habitat connectivity to much larger core habitat areas. Nonetheless, ubiquitous wildlife sighting evidence shows that the section of the Puente-Whittier Hills complex west of the 57 freeway, in its current state, is capable of supporting sub-populations of bobcat, mule deer, American badger, grey fox, and long-tailed weasel. The presence of these species in this urban adjacent habitat complex is a significant benefit to the general public.

The fragility of each of these species sub-populations is difficult to know or understand given the continuous incremental loss of finite habitat from development, increased public recreation demand from the pandemic, and severe compounding habitat degradation from drought and global warming. Wildlife tracking by the National Park Service in the Santa

Monica Mountains and the Simi Hills has demonstrated that many of the above species make do with home ranges an order of magnitude smaller than in for example the local national forests.

Because of these uniquely compact, urban adjacent home ranges, even a small development project will eliminate portions of home ranges and access to resources for some of these species. Those adversely affected animals are forced to encroach on the territories and habitat resources of animals with adjacent home ranges. That spatial competition has an outward ripple effect forcing many animals to seek and sort out new territorial boundaries. Given the described small home ranges, the latitude for successful readjustment of territories without the death of animals is scant. An inevitable outcome from each such development impact is an incremental reduction in the potential number of home ranges (individual animals) for each species in the Puente-Whittier Hills complex.

The permanent spatial loss and brush clearance degradation of available habitat acres is not the only adverse factor in this equation. Wildlife in the subject area survive in habitat impacted by utilities, roads, public trails, annual brush clearance, and many other unavoidable adverse edge effects caused by tens of miles of contact with residential development. Year-round water sources are also rare, unequally distributed, and increasingly less reliable with drought and global warming. Total tree canopy coverage is also declining from less available soil moisture.

The capability of the portion of the Puente-Whittier Hills west of the 57 freeway to absorb any more habitat loss and maintain sub-populations of bobcat, mule deer, American badger, grey fox, and long-tailed weasel is ecologically suspect given the small existing population sizes. Every acre of habitat loss or permanent brush clearance degradation is compounded by the described ecological fragility and small home ranges. Those adverse effects on the subject area's sub-population carrying capacity are further compounded by impacts to higher quality habitats including woodlands, mesic north-facing slopes, areas adjacent to protected lands, and habitat that includes or abuts habitat choke points across busy roads. The proposed project would destroy and permanently degrade all of these higher quality habitat types as well as Critical Habitat for the coastal California Gnatcatcher.

A project that substantially diminishes the capability of the Puente-Whittier Hills complex west of the 57 freeway to sustain sub-populations of bobcat, mule deer, American badger, grey fox, and long-tailed weasel would result in unavoidable significant biological impacts. In such case, no overriding considerations can be made to allow such permanent damage to a regionally significant public resource. The only prudent option is reduce the impact of such a deleterious proposed project either by footprint reduction or footprint location adjustment. These sub-populations even with some connectivity to the Chino Hills factored

in are already at critically low numbers and probably subject to some inbreeding.

The Draft Environmental Impact Report (DEIR) must spatially analyze the fragility of the Puente Whittier Hills complex west of the 57 freeway relative to its ability to continue to support sub-populations of bobcat, mule deer, American badger, grey fox, and long-tailed weasel. The DEIR must analyze value of the subject project property to this natural complex given all of its high quality habitat resources and integration with the best habitat linkage across Hacienda Boulevard. The DEIR must analyze how the proposed project and each DEIR alternative will eliminate portions of existing territories of these species. That analysis must factor in beneficial topographical features—more precisely the prominent east-west trending ridgeline that bisects the subject property.

The DEIR must demonstrate with substantial evidence any conclusions that the project, or any DEIR alternatives, will not result in substantive diminutions of the capability of the Puente-Whittier Hills sub-populations of the five above-listed mammals located west of the 57 freeway to remain as viable as they are today, or consistent with the legal baseline biological condition of the DEIR.

This equation is compounded by the fact that Southern California Edison is required to conduct a coastal sage scrub habitat restoration project on at least 16 acres of its fee simple property that forms much of the southern border of the subject property. Brush clearance is wholly incompatible with coastal sage scrub mitigation tied to impacts to coastal California Gnatcatcher habitat. The project cannot locate any structures that will require brush clearance on any portion of the SCE property devoted to coast sage scrub mitigation. Furthermore, when clear alternatives exist, the County should never approve any institutional project that requires permanent brush clearance on protected public lands in an SEA, Critical coastal California Gnatcatcher habitat, and regionally significant habitat linkage and public trail corridor.

The DEIR must include at least one fully analyzed alternative that does not require any annual brushing/fuel modification on any portion of the adjacent SCE property required to be used for coastal sage scrub mitigation.

The DEIR must include at least one fully analyzed alternative that does not require any annual brushing/fuel modification on any portion of the adjacent Habitat Authority open space property.

The DEIR must include at least one fully analyzed alternative that does not require grading of the prominent east-west trending ridgeline that bisects the subject property. The DEIR cannot conclude that such a project is economically infeasible without a complete economic analysis.

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The DEIR must analyze how the proposed project is a piecemeal addition to the applicant's extensive existing development footprint on multiple properties.

The DEIR must analyze how the stated project objectives can be fulfilled through the employment of a combination of a new project on the subject property and the applicant's existing developed resources. The DEIR cannot correctly conclude that the project is a standalone project that is not integrated with the applicant's existing developed resources.

We appreciate the opportunity to provide comments.

Please send any communications to the attention of our Chief of Natural Resources and Planning, Paul Edelman, at the above letterhead address or via email at edelman@smmc.ca.gov.

Sincerely,

Glenn Parker
Chairperson