

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

Glenn Parker, Chair, *City of Brea*
Michael Hughes, Vice-Chair, *Public Member*
Kelly Elliott, *California State Parks*
Stan Liu, *City of Diamond Bar*
Jessica Martinez, *City of Whittier*
Santa Monica Mountains Conservancy
Claire Schlotterbeck, *Public Member*
Ivan Sulic, *Los Angeles County Board of Supervisors*
Norm Zezula, *City of La Habra Heights*

Joseph T. Edmiston, FAICP, Hon. ASLA, Executive Officer
Rorie A. Skei, Chief Deputy Executive Officer

NOTICE IS HEREBY GIVEN pursuant to Section 54956 of the Government Code that the Wildlife Corridor Conservation Authority will hold a special meeting on April 13, 2022 at 11:00 a.m.

Please click on the link below to join the meeting. If you are calling by phone, please call one of the numbers listed below. If you are using one tap mobile on your cell phone, it should enter the meeting passcode as well as meeting ID. If it doesn't enter the passcode, it is below in bold. If you are dialing from a standard phone, you must enter the meeting ID and passcode listed in bold below.

<https://us02web.zoom.us/j/85745374807?pwd=QkhnYzZGaUN5UGFkR0RWamtnaEt5dz09>

Meeting ID: 857 4537 4807

Passcode: 850278

One tap mobile

+16699006833,,85745374807# US (San Jose)

+13462487799,,85745374807# US (Houston)

Dial by your location

+1 669 900 6833 US (San Jose)

+1 346 248 7799 US (Houston)

Meeting ID: 857 4537 4807

Find your local number: <https://us02web.zoom.us/j/kb0p4xMH1e>

The Wildlife Corridor Conservation Authority is a public entity established pursuant to the Joint Exercise of Powers Act, Government Code Section 6500 et seq. by agreement between the City of Whittier, City of Brea, City of La Habra Heights, City of Diamond Bar, Los Angeles County, and the Santa Monica Mountains Conservancy.

AGENDA

- I. Call to order.
- II. Roll Call.
- III. Comments by members of the public on items not on the agenda and public testimony on all agenda items. Except for items noticed as public hearings, all public comments shall be heard during the public comments section of the agenda. Individuals will be allowed three minutes to speak and representatives of organizations/agencies will be allowed five minutes to speak.
- IV. Governing Board and staff response to public comment. At this time the Governing Board and staff will respond to public comment and questions.
- V. Consent calendar:
 - (a) Approval of minutes from the meeting of September 14, 2021.
 - (b) Review and approval of Treasurer's report for the first quarter of Fiscal Year 2021-2022 submitted by Alice Hui, Treasurer, City of Whittier.
 - (c) Review and approval of Treasurer's report for the second quarter of Fiscal Year 2021-2022 submitted by Alice Hui, Treasurer, City of Whittier.
 - (d) Consideration of resolution authorizing holding Governing Board meetings via video and teleconference pursuant to AB 361.
- VI. Presentation by Hills for Everyone on potential environmental impacts of the proposed Hsi Lai Monastery expansion project in Hacienda Heights, unincorporated Los Angeles County.
- VII. Consideration of resolution authorizing a comment letter to Los Angeles County on the Draft Environmental Impact Report for the proposed Hsi Lai Monastery expansion project in Hacienda Heights, unincorporated Los Angeles County.
- VIII. Discussion and possible action regarding local land use issues and public open space protection actions.
- IX. Statements, responses, questions or directions to staff pursuant to Section 54954.2(a) of the Government Code which provides as follows:

“No action or discussion shall be undertaken on any item not appearing on the posted agenda, except that members of a legislative body or its staff may briefly respond to statements made or questions posed by persons exercising their public testimony rights under Section 54954.3. In addition, on their own initiative or in response to questions posed by the public, a member of a

legislative body or its staff may ask a question for clarification, make a brief announcement or make a brief report on his or her own activities. Furthermore, a member of a legislative body, or the body itself, subject to rules or procedures of the legislative body, may provide a reference to staff or other resources for factual information, request staff to report back to the body at a subsequent meeting concerning any matter or take action to direct staff to place a matter of business on a future agenda.”

X. Announcement of future meeting and adjournment.

Public participation is welcome on any agenda item. Members of the public wishing to address the Governing Board on any item should ask to be recognized when the Chair announces public testimony. In advance of the meeting, questions may be addressed to Diane Sacks at (310) 589-3230, ext. 122.

In accordance with the Americans with Disabilities Act of 1990, if you require a disability-related modification or accommodation to participate in this meeting, including auxiliary aids or services, please call Diane Sacks at 310-589-3230 ext. 122 at least 24 hours prior to the meeting.

Agenda Item V(a):

Approval of minutes from the meeting of September 14, 2021

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

MINUTES of the GOVERNING BOARD of the WILDLIFE CORRIDOR CONSERVATION AUTHORITY

September 14, 2021

I. Call to Order.

The regular meeting of the Governing Board of the Wildlife Corridor Conservation Authority (WCCA) was called to order by Chairperson Glenn Parker at 11:31 a.m. on September 14, 2021 via Zoom webinar.

II. Roll Call.

The roll was called and the following members were present: Glenn Parker, Chair; Michael Hughes, Vice-Chair; Kelly Elliott; Stan Liu; Jessica Martinez; Claire Schlotterbeck. Quorum present.

The following members were absent: Ivan Sulic; Jane Williams.

Staff present: Paul Edelman, Chief of Natural Resources and Planning; Jeff Maloney, Chief Staff Counsel; Barbara Collins, Executive Assistant and Diane Sacks, Board Secretary.

Public present: Enrique Arroyo, Chino Hills State Park Manager; Andrew Chou, WCCA Governing Board Alternate; Melanie Schlotterbeck, WCCA Advisory Committee.

III. Comments by members of the public on items not on the agenda and public testimony on all agenda items. Except for items notices as public hearings, all public comments shall be heard during the public comments section of the agenda. Individuals will be allowed three minutes to speak and representatives of organizations/agencies will be allowed five minutes to speak.

No comments were made.

IV. Governing Board and staff response to public comment. At this time the Governing Board and staff will respond to public comment and questions.

No comments were made.

V. Consent calendar:

- (a) **Approval of minutes from the meeting of January 20, 2021.**
- (b) **Review and approval of Treasurer's report for the third quarter of Fiscal Year 2020-2021 submitted by Monica Lo, Treasurer, City of Whittier.**
- (c) **Review and approval of Treasurer's report for the fourth quarter of Fiscal Year 2020-2021 submitted by Monica Lo, Treasurer, City of Whittier.**

A roll-call vote was administered.

On motion of the Vice-Chair, duly seconded, the consent calendar was unanimously approved.

VI. Consideration of resolution adopting budget for Fiscal Year 2021-2022.

A roll-call vote was administered.

On motion of Ms. Martinez, duly seconded, Resolution No. 21-03 was unanimously adopted.

(The full text of this resolution is attached)

VII. Consideration of resolution authorizing a comment letter to the County of Los Angeles on the Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR) for the Hsi Lai Monastery Site, Project No. 2018-000207-(4).

Comments were made by the Chair and the Chief of Natural Resources and Planning.

Questions were propounded by Ms. Claire Schlotterbeck.

Comments were made by the Chief of Natural Resources and Planning and the Chief Staff Counsel.

Questions were propounded by the Chair.

Comments were made by the Chief of Natural Resources and Planning and the Chair.

Questions were propounded by the Chair.

Comments were made by Ms. Claire Schlotterbeck.

A roll-call vote was administered.

On motion of Ms. Claire Schlotterbeck, duly seconded, Resolution No. 21-04 was unanimously adopted.

(The full text of this resolution is attached)

VIII. Discussion and possible action regarding local land use issues and public open space protection actions.

Comments were made by the Chief of Natural Resources and Planning, the Chair, the Vice-Chair and Ms. Claire Schlotterbeck.

A roll-call vote was administered.

On motion of the Vice-Chair, duly seconded, and unanimously approved, WCCA Governing Board will send an endorsement letter to the California Natural Resources Agency regarding the 30x30 Campaign Acquisition Opportunities in and around Orange County, California.

IX. Update on Mountains Recreation and Conservation Authority acquisitions adjacent to Chino Hills State Park.

Comments were made by the Chief of Natural Resources and Planning, the Chair, Mses. Claire Schlotterbeck and Melanie Schlotterbeck.

Questions were propounded by the Chair.

Comments were made by Ms. Elliott, the Chair and Ms. Claire Schlotterbeck.

Questions were propounded by the Chair.

Comments were made by Mses. Claire Schlotterbeck and Melanie Schlotterbeck.

Questions were propounded by the Chief of Natural Resources and Planning.

Comments were made by the Vice-Chair, Ms. Claire Schlotterbeck and the Chief of Natural Resources and Planning.

X. Statements, responses, questions or directions to staff pursuant to Section 54954.2(a) of the Government Code which provides as follows:

“No action or discussion shall be undertaken on any item not appearing on the posted agenda, except that members of a legislative body or its staff may briefly respond to statements made or questions posed by persons exercising their public testimony rights under Section 54954.3. In addition, on their own initiative or in response to questions posed by the public, a member of a legislative body or its staff may ask a question for clarification, make a brief announcement, or make a brief report on his or her own activities. Furthermore, a member of a legislative body, or the body itself, subject to rules or procedures of the legislative body, may provide a reference to staff or other resources for factual information, request staff to report back to the body at a subsequent meeting concerning any matter, or take action to direct staff to place a matter of business on a future agenda.”

Questions were propounded by Ms. Claire Schlotterbeck.

Comments were made by the Chief of Natural Resources and Planning.

Questions were propounded by the Chair.

Comments were made by the Vice-Chair, the Chair and the Chief of Natural Resources and Planning.

Questions were propounded by the Chair.

Comments were made by Ms. Claire Schlotterbeck.

Questions were propounded by the Chair.

Comments were made by Ms. Claire Schlotterbeck.

XI. Announcement of next meeting and adjournment.

The next regularly scheduled meeting is February 8, 2022.

There being no further business, the meeting was adjourned at 12:07 p.m.

WCCA Governing Board Minutes
September 14, 2021
Page 5

Respectfully submitted:

Approved:

Joseph T. Edmiston, FAICP, Hon. ASLA
Executive Officer

Glenn Parker
Chairperson

Agenda Item V(b):

Review and approval of Treasurer's report for the first quarter of Fiscal Year 2021-2022 submitted by Alice Hui, Treasurer, City of Whittier



City of Whittier

ADMINISTRATIVE SERVICES DEPARTMENT

13230 Penn Street, Whittier, California 90602-1716

(562) 567-9810 Fax (562) 567-2873 www.cityofwhittier.org

October 20, 2021

Joseph T. Edmiston
Executive Officer
Wildlife Corridor Conservation Authority
5810 Ramirez Canyon Road
Malibu, CA 90265

Dear Mr. Edmiston:

Enclosed is the Wildlife Corridor Conservation Authority (WCCA) Treasurer's Report for the quarter ending September 30, 2021. Please submit the report to the WCCA Board of Directors' next meeting for receive and file action.

If there are questions about the report, my telephone number is (562) 567-9836.

Sincerely,

Alice Hui
Treasurer
Wildlife Corridor Conservation Authority

Enc.

**WILDLIFE CORRIDOR CONSERVATION AUTHORITY
QUARTERLY TREASURER'S REPORT
JULY - SEPTEMBER 2021**

CASH

| | BEGINNING BALANCE | REGULAR DEPOSITS | REGULAR W/D | ENDING BALANCE |
|--|----------------------|---------------------|----------------|-------------------|
| | \$ 3,854.08 | 2,000.00 | 3,000.00 | \$ 2,854.08 |

| | | | | |
|-------------------|-------------|----------|----------|------------|
| TOTAL CASH | \$ 3,854.08 | 2,000.00 | 3,000.00 | \$2,854.08 |
|-------------------|-------------|----------|----------|------------|



Alice Hui, Assistant Director of Administrative Services

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

WELLS FARGO BANK - 4735800625

CASH FLOW

| | MONTH | DONATIONS | DEPOSITS | WITHDRAWALS | BALANCE |
|----|--------------------------|-----------|----------|-------------|----------|
| | BALANCE FORWARD | | | | 3,854.08 |
| | JULY CASH FLOW 2021 | | | | 3,854.08 |
| | AUGUST CASH FLOW 2021 | | | | 3,854.08 |
| | SEPTEMBER CASH FLOW 2021 | | | | 3,854.08 |
| 2 | CITY OF WHITTIER DEPOSIT | 500.00 | | | 4,354.08 |
| 10 | DIAMOND BAR DEPOSIT | 500.00 | | | 4,854.08 |
| 10 | CITY OF LA HABRA HEIGHTS | 500.00 | | | 5,354.08 |
| 23 | CITY OF BREA | 500.00 | | | 5,854.08 |
| 28 | Billing for FY 20-21 | | | 3,000.00 | 2,854.08 |
| | | | | | 2,854.08 |

Agenda Item V(c):

Review and approval of Treasurer's report for the second quarter of Fiscal Year 2021-2022 submitted by Alice Hui, Treasurer, City of Whittier



City of Whittier

ADMINISTRATIVE SERVICES DEPARTMENT

13230 Penn Street, Whittier, California 90602-1716

(562) 567-9810 Fax (562) 567-2873 www.cityofwhittier.org

January 19, 2022

Joseph T. Edmiston
Executive Officer
Wildlife Corridor Conservation Authority
5810 Ramirez Canyon Road
Malibu, CA 90265

Dear Mr. Edmiston:

Enclosed is the Wildlife Corridor Conservation Authority (WCCA) Treasurer's Report for the quarter ending December, 2021. Please submit the report to the WCCA Board of Directors' next meeting for receive and file action.

If there are questions about the report, my telephone number is (562) 567-9836.

Sincerely,

Alice Hui
Treasurer
Wildlife Corridor Conservation Authority

Enc.

**WILDLIFE CORRIDOR CONSERVATION AUTHORITY
QUARTERLY TREASURER'S REPORT
OCTOBER - DECEMBER 2021**

CASH

| | BEGINNING BALANCE | REGULAR DEPOSITS | REGULAR W/D | ENDING BALANCE |
|--|----------------------|---------------------|----------------|-------------------|
| | \$ 2,854.08 | 500.00 | 0.00 | \$ 3,354.08 |

| | | | | |
|-------------------|-------------|--------|------|------------|
| TOTAL CASH | \$ 2,854.08 | 500.00 | 0.00 | \$3,354.08 |
|-------------------|-------------|--------|------|------------|

Alice Hui, Assistant Director of Administrative Services

Agenda Item V(d):

Consideration of resolution authorizing holding Governing Board meetings
via video and teleconference pursuant to AB 361

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

MEMORANDUM

Date: April 13, 2022

To: The Governing Board Members



From: Joseph T. Edmiston, FAICP, Hon. ASLA, Executive Officer

Subject: **Agenda Item V(d): Consideration of resolution authorizing holding Governing Board meetings via video and teleconference pursuant to AB 361.**

Staff Recommendation: That the Governing Board adopt the attached resolution authorizing holding Governing Board meetings via video and teleconference pursuant to AB 361.

Background: During the Covid-19 pandemic, the WCCA Governing Board has conducted meetings offering teleconferencing accessibility to members of the public, Board members, and staff. Governor Newsom's executive orders authorizing such meetings expired recently, roughly concurrent with the adoption of Assembly Bill 361 which addresses this issue.

AB 361 allows for a waiver of certain provisions of the Brown Act in order to allow local agencies to continue to meet remotely. Specifically, the bill allows remote teleconference flexibility, during a state of emergency that makes it unsafe to meet in person. WCCA has already implemented the requirements of AB 361 for conducting public meetings and is in full compliance, thus there will be no change of the currently established procedures.

The proposed Resolution makes the required findings under AB 361 for the period since the implementation of AB 361, and if adopted, will allow the Governing Board to continue to offer teleconference accessibility for public meetings, to help mitigate the spread of Covid-19, as well as during other state-proclaimed emergencies, such as earthquakes or wildfires, where physical attendance may present a risk.

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

April 13, 2022 — Agenda Item V(d)
Resolution No. 22-01

RESOLUTION OF THE GOVERNING BOARD OF THE WILDLIFE CORRIDOR CONSERVATION AUTHORITY AUTHORIZING HOLDING GOVERNING BOARD MEETINGS VIA VIDEO AND TELECONFERENCE PURSUANT TO AB 361

WHEREAS, the State of California is currently subject to an emergency declaration due to the ongoing Covid-19 pandemic;

WHEREAS, on June 11, 2021, Governor Newsom issued Executive Order N-08-021 which authorized accommodations for video and teleconferencing for the purposes of holding public meetings subject to the Brown Act;

WHEREAS, Assembly Bill 361 was recently signed into law by Governor Newsom which amends the Government Code to allow local public agencies to continue to meet utilizing video and teleconferencing technology during the ongoing state of emergency subject to certain measures ensuring public access to said meetings and that no action be taken during a disruption that prevents agencies from broadcasting the proceedings; and

WHEREAS, the applicable requirements of AB 361 ensuring meaningful public access and participation in public meetings have been and will continue to be implemented by the Wildlife Corridor Conservation Authority (WCCA) Governing Board during the current state of emergency.

Resolved, That the Governing Board of the Wildlife Corridor Conservation Authority (WCCA) hereby:

1. FINDS that the above recitals are true and correct and are incorporated into this resolution as findings;
2. FINDS that the state of emergency currently exists that directly impacts the ability of members and the public to meet safely in person;
3. FINDS that local, county, and state agency officials currently have imposed or recommend measures to promote social distancing;
4. FINDS that the requirements of AB 361 to ensure public access and participation are currently in use by the WCCA Governing Board and have been at all times since the implementation of AB 361 and that the findings included in this resolution are and have been true, correct, and applicable at all times since that implementation;
5. AUTHORIZES holding Governing Board meetings via video and teleconference pursuant to AB 361; and

6. AUTHORIZES the Executive Officer or his designee to do any and all acts necessary to carry out this resolution and any recommendations made by the Governing Board.

Chairperson

AYES:

NOES:

ABSTENTIONS:

ABSENT:

I HEREBY CERTIFY that the foregoing resolution was adopted at a special meeting of the Governing Board of the Wildlife Corridor Conservation Authority, duly noticed and held according to law, on the 13th day of April, 2022.

Dated: 4/13/22

Executive Officer

Agenda Item VI:

Presentation by Hills for Everyone on potential environmental impacts of the proposed Hsi Lai Monastery expansion project in Hacienda Heights, unincorporated Los Angeles County



Hsi Lai Temple Update





Presentation Outline

✓ Puente-Chino Hills Wildlife Corridor

- Chokepoints
- Hsi Lai Temple Project
- Project Status
- Next Steps

Protected Lands in the Puente-Chino Hills Wildlife Corridor



Animal Species



Plant Communities

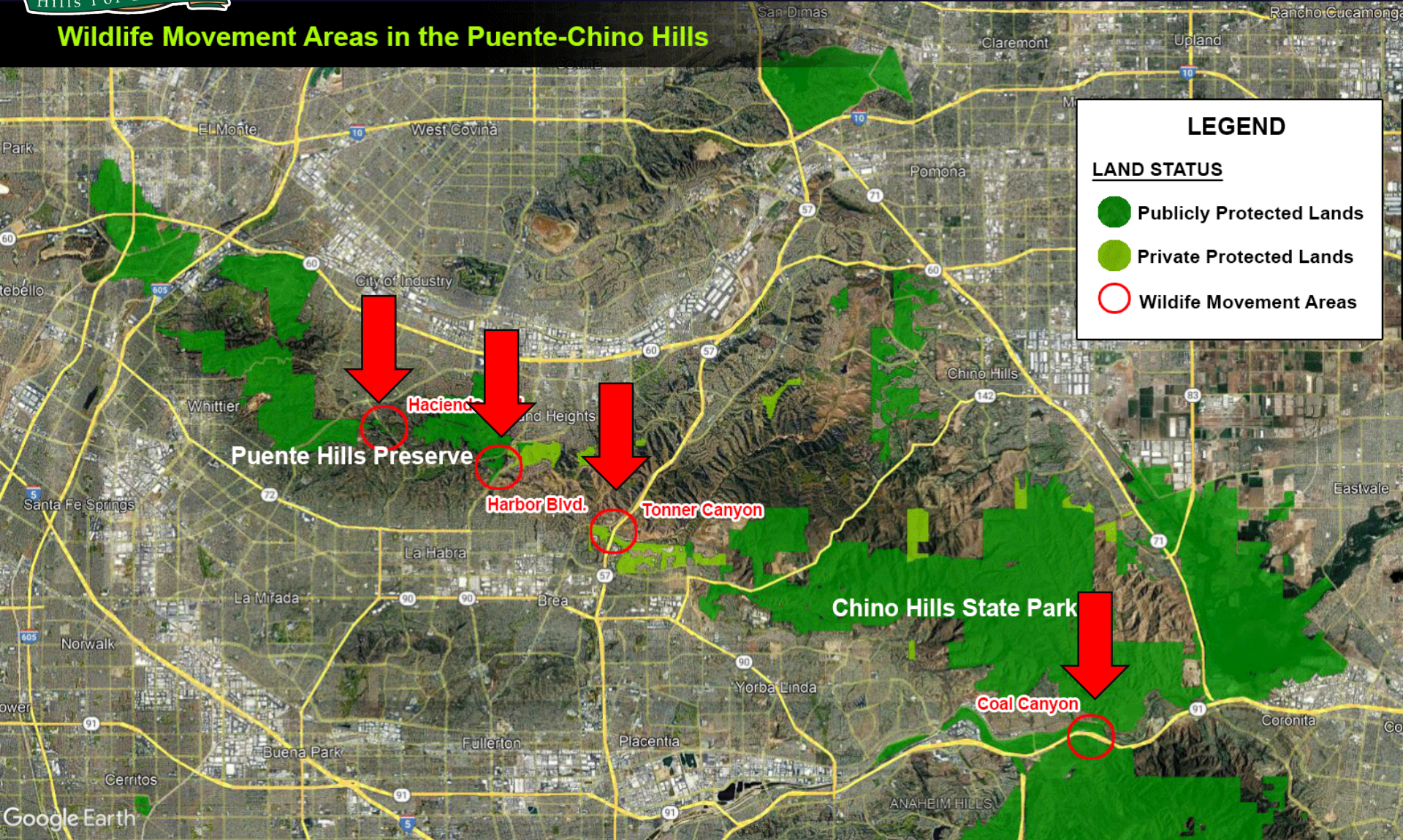




Presentation Outline

- Puente-Chino Hills Wildlife Corridor
 - ✓ Chokepoints
- Hsi Lai Temple Project
- Project Status
- Next Steps

Wildlife Movement Areas in the Puente-Chino Hills



Existing Protected Connections



Coal Canyon
\$63.5M



Harbor Blvd.
\$1M

Wildlife Connectivity Hindered



Robb Hamilton



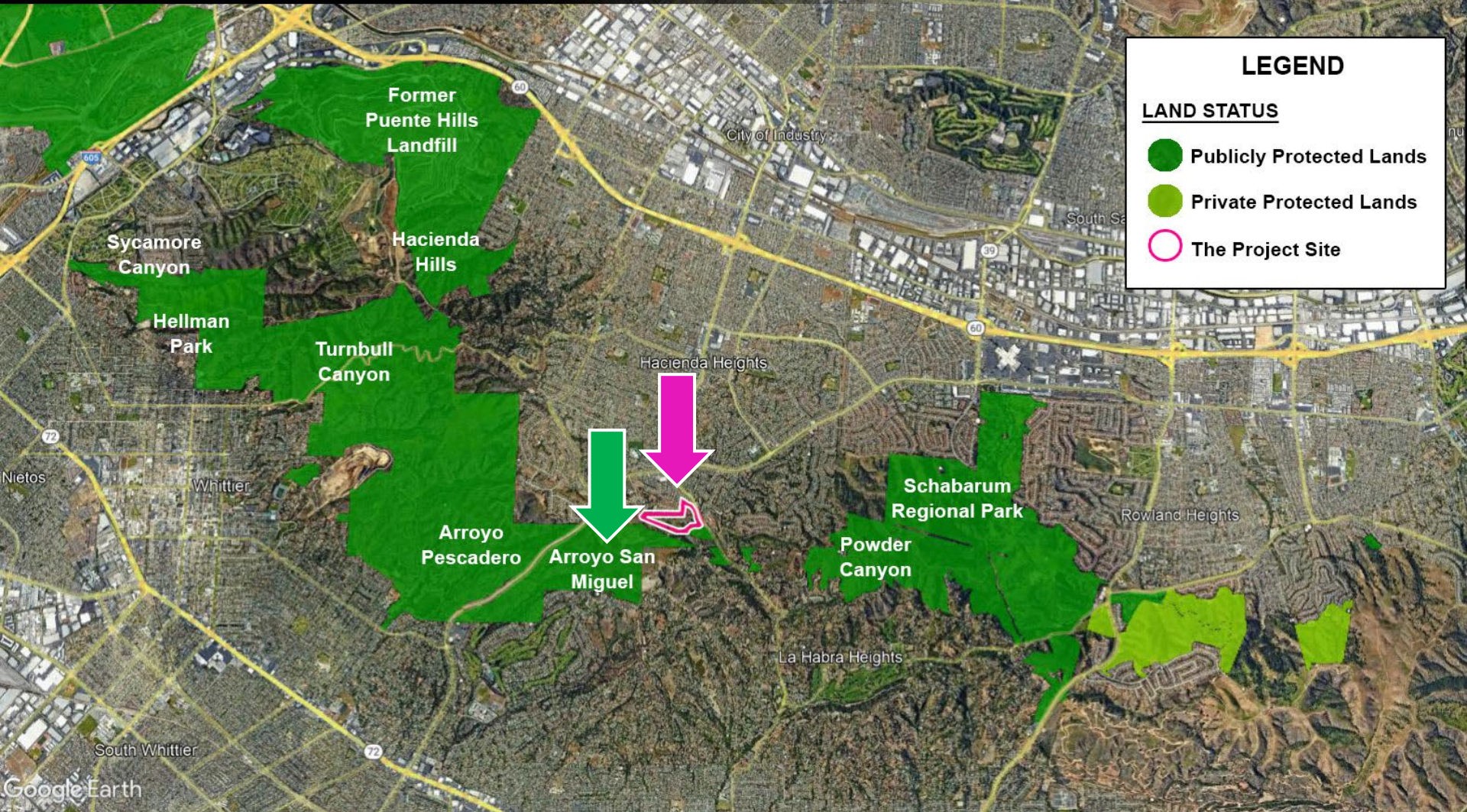
Presentation Outline

- Puente-Chino Hills Wildlife Corridor
- Chokepoints
- ✓ Hsi Lai Temple Project
- Project Status
- Next Steps

Hsi Lai Temple



Protected Lands in the Puente Hills





The Expansion Proposal

- 17 new buildings
 - Meditation Halls
 - Classrooms
 - Dorms
 - Offices
 - Multi-use Spaces
- Renovation of a house into a dorm
- Two driveways onto South Hacienda Blvd
- Seven level subterranean garage

Project Location





Land Use Designations

- Land Use: Rural Land (RL2) → Institutional
- Zoning: Light & Heavy Agriculture

Compliance Areas

- Hacienda Heights Community Plan
- Hillside Management Area Ordinance
- Hillside Design Guidelines



Known Permits Needed

- **Oak Tree Removal Permit**
- **Grading Permit**
- **Conditional Use Permit**
- **Encroachment Permit**

Traffic Congestion



Wildfire Risks



Extensive Grading



Cut: 80,040 yd³

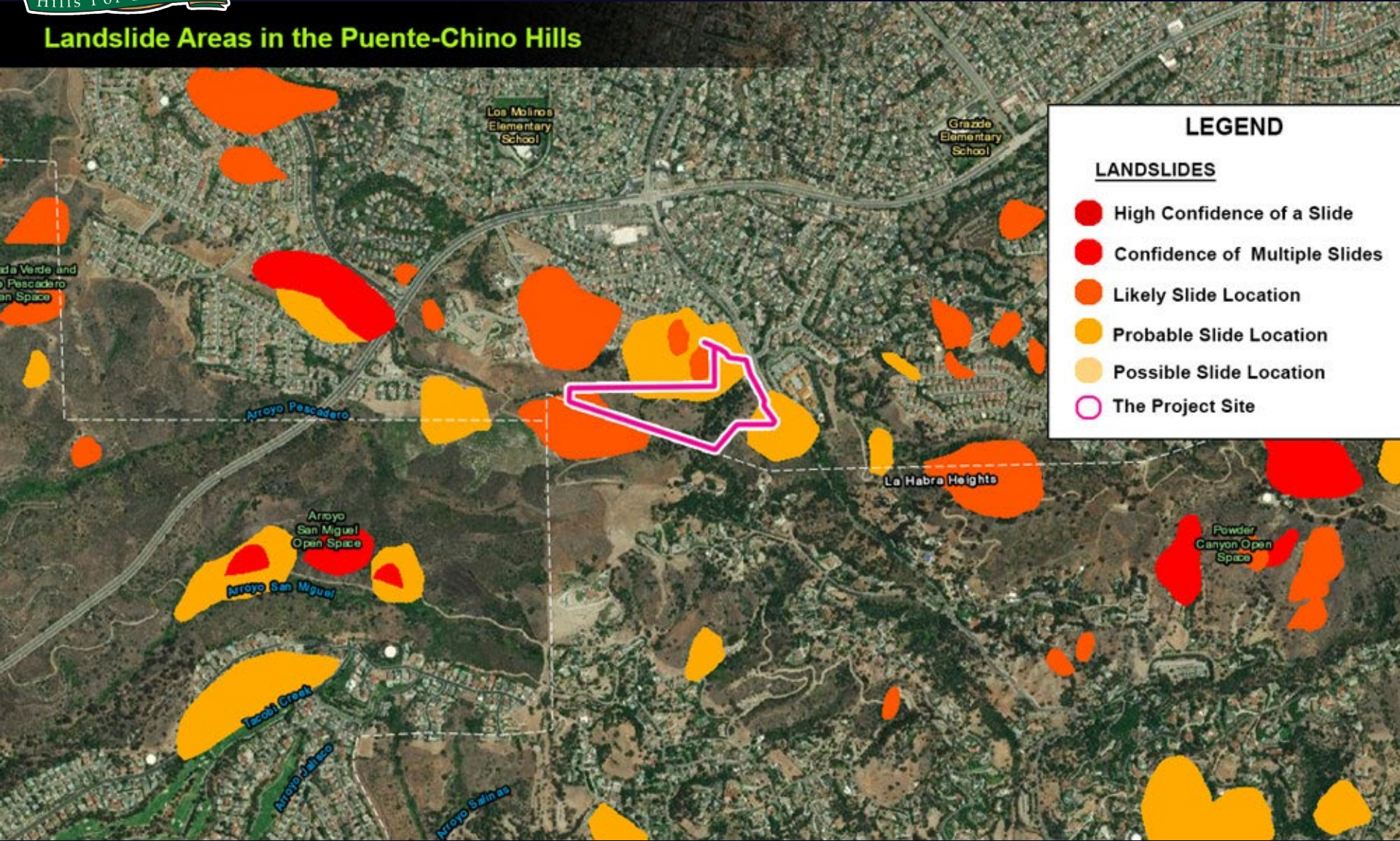
Fill: 32,292 yd³

Net: 47,748 yd³
(Export)



3,410- 4,775 Truck Trips

Landslide Areas in the Puente-Chino Hills



LEGEND

LANDSLIDES

- High Confidence of a Slide
- Confidence of Multiple Slides
- Likely Slide Location
- Probable Slide Location
- Possible Slide Location
- The Project Site

Base Map US Geological Survey



Trail Connectivity Lost



Robb Hamilton

Biological Constraints



Hsi Lai Monastery Site

Biological Constraints Analysis

Los Angeles County Project No: 2018-000207
 APNs: 8240-036-021, 8291-035-020, 8291-035-021

prepared for

International Buddhist Progress Society
 3456 Glenmark Drive
 Hacienda Heights, California 91745
 Contact: Gena Ooi, Project Coordinator
 Via email: gena.ooi@ibps.org

prepared by

Rincon Consultants, Inc.
 250 East 1st Street, Suite 1400
 Los Angeles, California 90012
 Contact: Christopher Julian, Principal/ Senior Regulatory Specialist
 Via email: cjulian@rinconconsultants.com

December 2019



Notice of Preparation

\$215M Public/Private Investment at Risk



Habitat & Wildlife Losses



Loss of Oak Woodlands

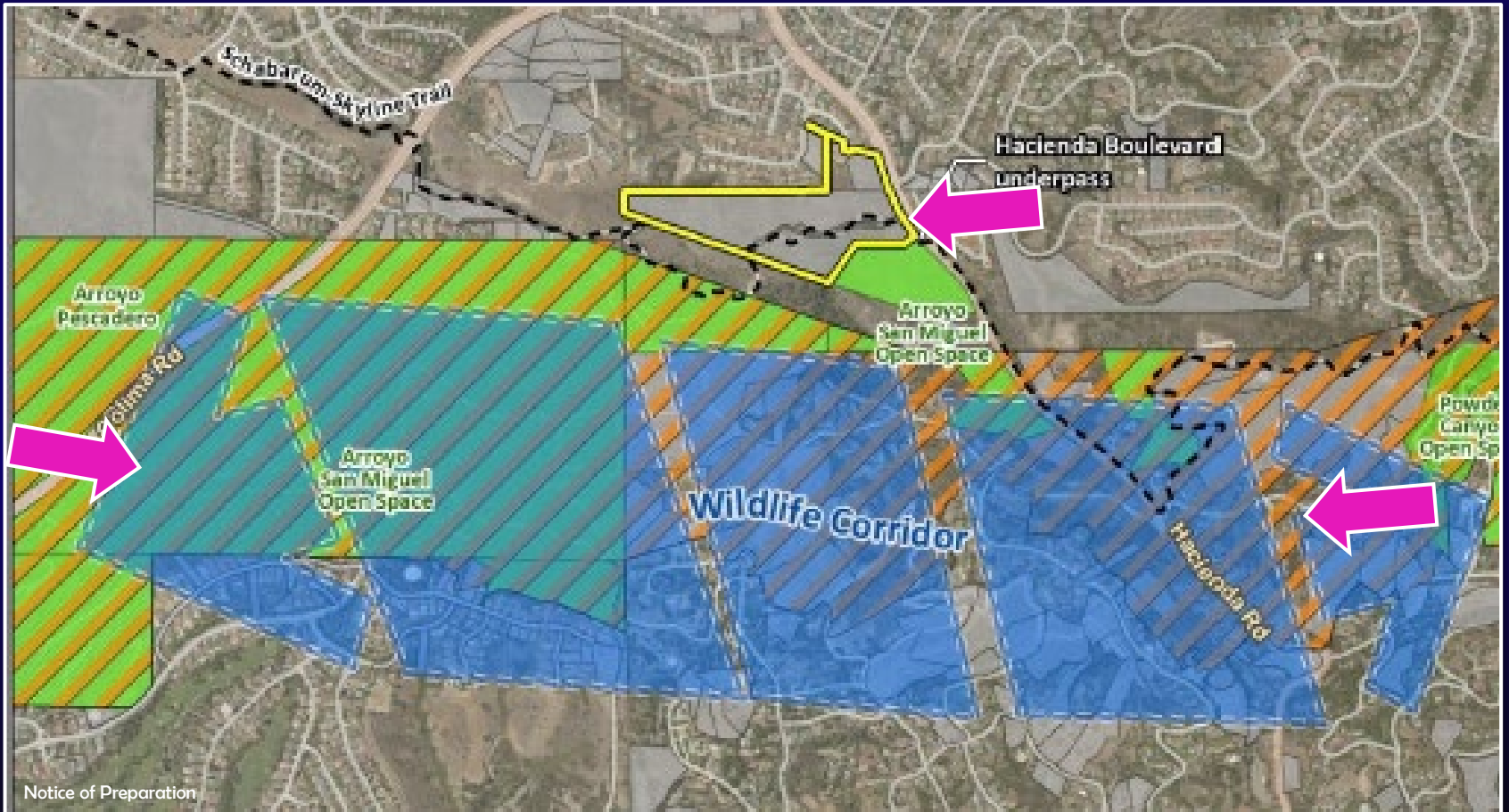
Figure 8 Oak Tree and Woodland Map



Imagery provided by Microsoft Bing and its licensors © 2019.

BCR Fig 11 Oak Woodland

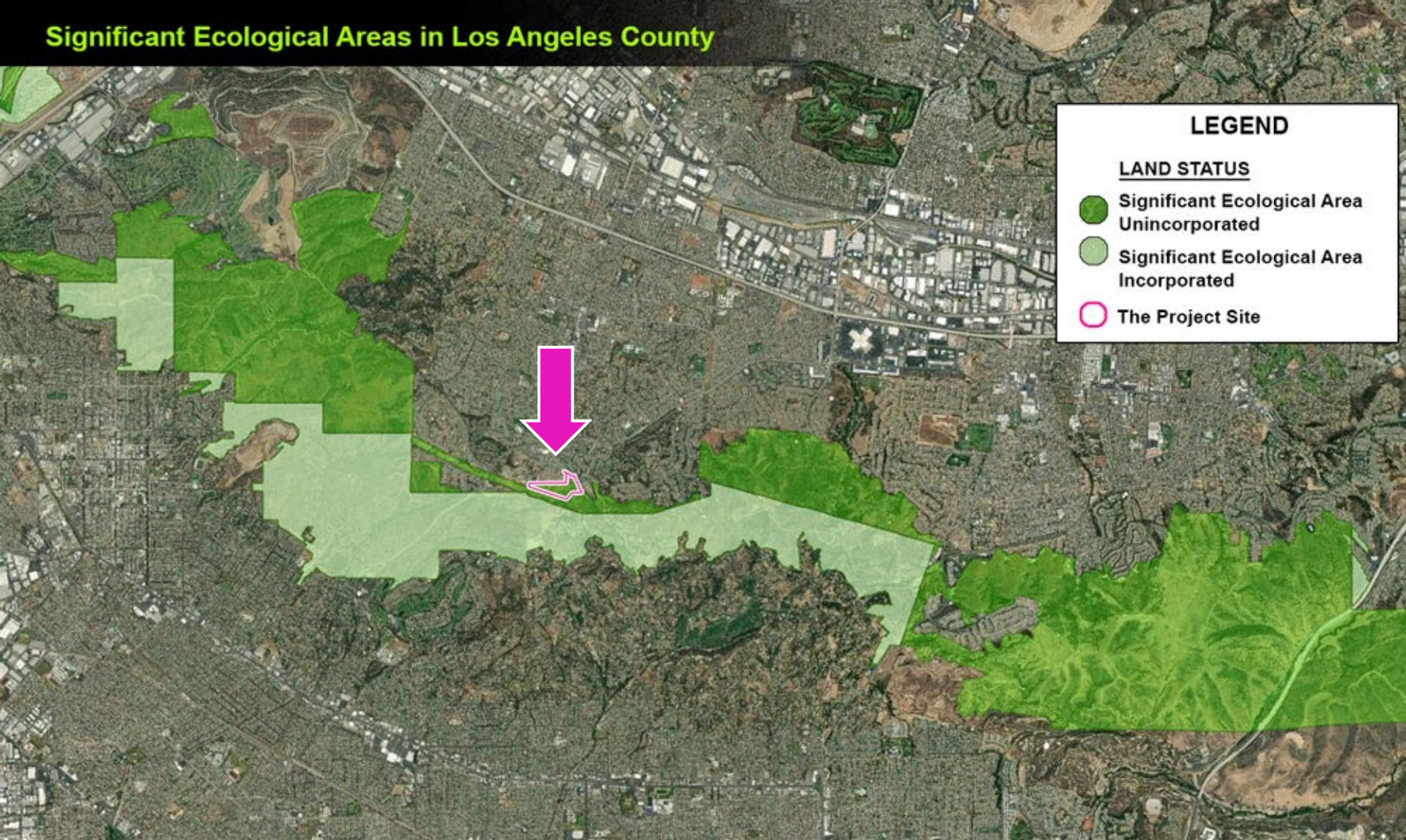
Incorrect Corridor Location





Outside the SEA

Significant Ecological Areas in Los Angeles County



Adjacency to Protected Lands





Presentation Outline

- Puente-Chino Hills Wildlife Corridor
- Chokepoints
- Hsi Lai Temple Project
- ✓ Project Status
- Next Steps



Project Status



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodck, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

**NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT
AND NOTICE OF PUBLIC SCOPING MEETING**

DATE: October 28, 2020

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations and Interested Parties

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report (EIR) in Compliance with Title 14, Section 15082(a) of the California Code of Regulations.

The County of Los Angeles ("County") is the lead agency pursuant to the California Environmental Quality Act ("CEQA") and intends to prepare an EIR for the proposed project identified below. The County has prepared this Notice of Preparation ("NOP") to provide Responsible Agencies and other interested parties with information describing the project and to identify its potential environmental effects pursuant to State requirements.




AGENCIES: The County requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the proposed project, in accordance with Section 15082(b) of the CEQA Guidelines. Your agency will need to use the EIR prepared by the County when considering any permits that your agency must issue, or other approval for the Project.

ORGANIZATIONS AND INTERESTED PARTIES: The County requests your comments and concerns regarding the environmental issues associated with construction and operation of the proposed project.

PROJECT & PERMIT(S): Hsi Lai Monastery Site
Project No. **2018-000207-4**) Conditional Use Permit ("CUP") No. RPPL2019000532, Oak Tree Permit No. RPPL2019000545, Environmental Plan No. RPPL2019002651

PROJECT APPLICANT: International Buddhist Progress Society (IBPS)

320 West Temple Street • Los Angeles, CA 90012 • 213-974-6411 • TDD: 213-617-2292

   @LACDRP | planning.lacounty.gov

NOP

October 2020

EIR

Timing Unknown



Presentation Outline

- Puente-Chino Hills Wildlife Corridor
- Chokepoints
- Hsi Lai Temple Project
- Project Status
- ✓ Next Steps



Next Steps

- Request notification of EIR.
 - jhui@planning.lacounty.gov
- Provide substantive comments.
- Oppose the project due to wildlife connectivity and habitat impacts.

Questions?



Agenda Item VII:

Consideration of resolution authorizing a comment letter to Los Angeles County on the Draft Environmental Impact Report for the proposed Hsi Lai Monastery expansion project in Hacienda Heights, unincorporated Los Angeles County

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

April 13, 2022 — Agenda Item VII
Resolution No. 22-02

RESOLUTION OF THE GOVERNING BOARD OF THE WILDLIFE CORRIDOR
CONSERVATION AUTHORITY AUTHORIZING A COMMENT LETTER TO LOS
ANGELES COUNTY ON THE DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE PROPOSED HSI LAI MONASTERY EXPANSION PROJECT IN
HACIENDA HEIGHTS, UNINCORPORATED LOS ANGELES COUNTY

Resolved, That the Governing Board of the Wildlife Corridor Conservation Authority (WCCA) hereby authorizes the Chairperson to send a comment letter to the County of Los Angeles on the Draft Environmental Impact Report (DEIR) for the proposed Hsi Lai Monastery expansion project in Hacienda Heights, unincorporated Los Angeles County.

Chairperson

AYES:

NOES:

ABSTENTIONS:

ABSENT:

I HEREBY CERTIFY that the foregoing resolution was adopted at a special meeting of the Governing Board of the Wildlife Corridor Conservation Authority, duly noticed and held according to law, on the 13th day of April, 2022.

Dated: 4/13/22

Executive Officer

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

GLENN PARKERCHAIR
CITY OF BREA

September 14, 2021

MICHAEL HUGHESVICE-CHAIR
PUBLIC MEMBER
LOS ANGELES COUNTYCounty of Los Angeles
Department of Regional Planning
Zoning Permits East Section**KELLY ELLIOTT**

CALIFORNIA STATE PARKS

Attn: Jolee Hui

STAN LIU

CITY OF DIAMOND BAR

c/o Ed Rojas (NOP Comments)
320 West Temple Street, 13th Floor
Los Angeles, California 90012SANTA MONICA MOUNTAINS
CONSERVANCY**Notice of Preparation (NOP) of the Draft Environmental Impact
Report (DEIR) for the Hsi Lai Monastery Site,
Project No. 2018-000207-(4)****JESSICA MARTINEZ**

CITY OF WHITTIER

Dear Ms. Hui:

CLAIRE SCHLOTTERBECKPUBLIC MEMBER
ORANGE COUNTY**IVAN SULIC**LOS ANGELES COUNTY
BOARD OF SUPERVISORS

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.

JANE L. WILLIAMS

CITY OF LA HABRA HEIGHTS

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.

Jolee Hui
Hsi Lai Monastery Site Project NOP Comments
September 14, 2021
Page 4

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,

A handwritten signature in black ink, appearing to read "Glenn Parker", written over a light blue horizontal line.

Glenn Parker
Chairperson



CONTACT:

Melanie Schlotterbeck, Cell: (714) 501-3133

FOR IMMEDIATE RELEASE

August 18, 2021

Agenda Item VII

WCCA

4/13/22

**Escrow Closes on Key Ridgelines
Adjacent to Chino Hills State Park**

Brea, California—The second of two acquisitions funded in May 2021 by the Wildlife Conservation Board (WCB) closed escrow on Wednesday, August 18th, thus permanently protecting 320 acres as parkland. The land, named after its owners: First National Investment Properties (First National), includes ridgelines visible from the popular Lower Aliso Canyon Overlook. In addition, the second and final phase (80 acres) of the Eastbridge acquisitions finished the ridgeline protections identified in Lower Aliso Canyon earlier this summer. Both properties have been on the “must have” list for Hills For Everyone (HFE) and the California Department of Parks and Recreation for over 40 years. The conserved ridgelines now protect two important natural features: the viewshed and the watershed. With the ridgelines and the watershed protected, wildlife are safer from the pollution generated by nearby homes (i.e., pesticides, herbicides, chemicals, etc.).

Both First National and Eastbridge parcels were identified early on during the State’s Feasibility Study for the creation of Chino Hills State Park in the late 1970s. Since the Park was designed along ridgeline boundaries, both of these properties were needed because they contain the majority of the eastern ridgelines of what would become the State Park. Original plans included using the First National land for the main entrance of the Park. Those entrance plans were set aside because the previous property owner was unwilling to sell the land at fair market value (a requirement when using state or federal funds). Instead, the Park’s entrance road was built in Bane Canyon. When the land was purchased by First National, discussions quickly began with The Conservation Fund to protect it in three phases.

“For the last 12 months, Hills For Everyone has worked in tandem with the Fund to secure all the appropriate funding, reviews, documentation, and approvals needed for protecting the land,” said Claire Schlotterbeck, Executive Director of Hills For Everyone. “In fact, it is only because of partnerships that the land is in park status—thanks to the Mountains Recreation and Conservation Authority (MRCA).”

Funding was secured, along with willing sellers, but State Parks was unwilling to accept ownership. To ensure we didn't miss a long-awaited opportunity, HFE worked closely with MRCA to become an interim owner and manager of the properties. MRCA already owns and manages 400 acres of the Eastbridge property; 320 acres of which closed in July 2020 and the remaining 80 acres closing on June 28, 2021.

These acquisitions not only protect important habitats, but also build on east-west connections between the State Park and Prado Wetlands. These movement corridors are especially important during wildfires when animals need to move between protected areas quickly. Both properties burned in the October 2020 Blue Ridge Fire.

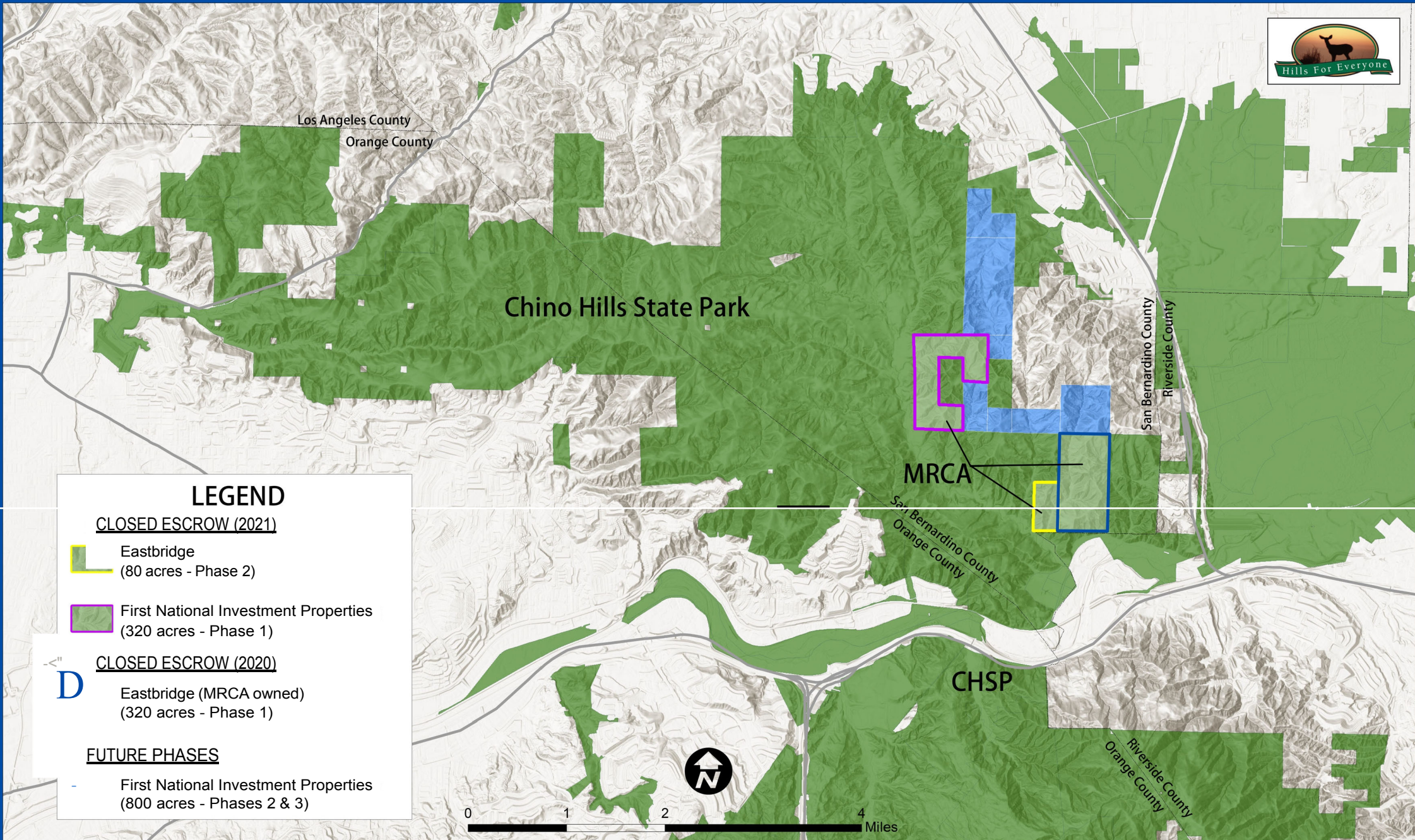
Schlotterbeck added, "These two acquisitions bring us closer to completing the original vision of protecting the ridgelines. We look forward to continuing our partnership with The Conservation Fund and MRCA on the final two phases of the First National acquisitions. Over the last two years 720 acres have been protected because of our efforts and collaboration."

These properties were identified in the Park's General Plan from 1999, and the long-term goal is to add these properties into state ownership to grow Chino Hills State Park. See the acquisition map and photos.

###

*For more than 40 years, **Hills For Everyone** has worked to preserve the unique and disappearing landscapes of the Puente-Chino Hills Wildlife Corridor.*

Two Acquisitions Close Escrow Adjacent to Chino Hills State Park



LEGEND

CLOSED ESCROW (2021)

-  Eastbridge (80 acres - Phase 2)
-  First National Investment Properties (320 acres - Phase 1)

CLOSED ESCROW (2020)

-  **D** Eastbridge (MRCA owned) (320 acres - Phase 1)

FUTURE PHASES

-  First National Investment Properties (800 acres - Phases 2 & 3)

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

GLENN PARKERCHAIR
CITY OF BREA**MICHAEL HUGHES**VICE-CHAIR
PUBLIC MEMBER
LOS ANGELES COUNTY**KELLY ELLIOTT**

CALIFORNIA STATE PARKS

STAN LIU

CITY OF DIAMOND BAR

SANTA MONICA MOUNTAINS
CONSERVANCY**JESSICA MARTINEZ**

CITY OF WHITTIER

CLAIRE SCHLOTTERBECKPUBLIC MEMBER
ORANGE COUNTY**IVAN SULIC**LOS ANGELES COUNTY
BOARD OF SUPERVISORS**JANE L. WILLIAMS**

CITY OF LA HABRA HEIGHTS

January 8, 2021

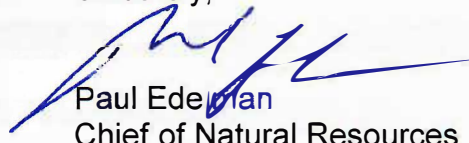
County of Los Angeles
Department of Regional Planning
Zoning Permits East Section
320 West Temple Street, 13th Floor
Los Angeles, California 90012**Hsi Lai Monastery Site Project (PN 2018-000207)
Notice of Preparation Comments**

Dear Ms. Hui:

The Wildlife Corridor Conservation Authority (WCCA) staff offers the following comments on the above referenced Notice of Preparation in Hacienda Heights. Any multi-acre development in the Whittier Hills would result in an unavoidable significant adverse impact on the ecological carrying capacity of the Whittier Hills. When the by-right development of most of the remaining undeveloped hillside lots is factored into that equation, the existing ecological carrying capacity of the Whittier Hills will continually decline over time. The proposed project is further located in a constricted section of the ecosystem and that is bisected by a busy arterial road. Further constraints include that it is located on the more-mesic north-facing slope and that the whole site is part of a County-designated Significant Ecological Area (SEA). In addition, it is adjacent to public open space acquired for wildlife purposes.

Any project on the site should maximize clustering all development and lighting as far northward as possible. Habitat loss and fuel modification zone square footage must be minimized to the maximum extent possible. In general, the scale of the proposed project with hundreds of parking spaces, which means thousands of headlights on any given night, is totally incompatible with the ecological constraints and with acceptable land use intensity within an SEA. Concentrating a significant additional amount of traffic at this site with no substantial mitigation for safe wildlife movement under Hacienda Boulevard is another significant unavoidable impact. The construction of an adequately located, minimum 12 by 12-foot box (or equivalent openness arch structure) culvert is necessary to mitigate these permanent proposed wildlife movement impacts.

Sincerely,



Paul Ederman
Chief of Natural Resources



State of California - Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



December 8, 2020

Jolee Hui
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012
jhui@planning.lacounty.gov

Subject: Comments on the Notice of Preparation for the Hsi Lai Monastery Site Project, SCH #2020110040, Los Angeles County

Dear Jolee Hui:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) from the Los Angeles County Department of Regional Planning (County; Lead Agency) for the Hsi Lai Monastery Site Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 2 of 13

Project Description and Summary

Objective: The Project consists of the development of a monastery retreat center with associated accessory uses on a 28.96-acre site. The Project would involve:

- Development of 17 buildings concentrated on the northern portion of the site [Assessor's Parcel Number (APN) 8240-036-021];
- Renovation of one existing 5,318 square-foot residential building into a volunteers' dormitory (APN 8291-035-021);
- Construction of a total of 297 parking spaces via a seven-level subterranean garage;
- Development of a new multi-use public trail along the southeasterly portion of the site (APN 8291-035-020). The remaining portion of the site would remain undeveloped except for new landscaping and walkways.

Location: The Project site is located at 15866 Draper Road, Hacienda Heights, CA 91745 (west of Hacienda Boulevard). The Project site is directly across from the existing Fo Guang Shan Hsi Lai Temple at 3456 Glenmark Drive. APNs associated with the proposed Project are 8240-036-021, 8291-035-020, and 8291-035-021.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

Specific Comments

- 1) Impacts from trail expansion and recreational use. The proposed Project designs include the construction of a new public nature trail along the southern portion of the Project site. Page 92 of the IS states, "the establishment of a trail along the southeasterly portion of the property could result in potential impacts to the existing oak woodland habitat and a drainage feature." Recreational trails are known to impact surrounding habitat through several ways: increased traffic, loss of habitat from erosion, increased noise, increased trash or pet waste, and introduction of invasive species from other sites.
 - a) Understanding wildlife responses to recreation and the area of influence of human activities may help managers judge whether wildlife populations are experiencing stress due to interactions with humans. CDFW recommends including an analysis of recreational usage of the trail system in which current levels of traffic (hiker, biker, and dog) are compared to the expected increase in traffic as a result of trail expansion and improvements. This analysis may aid in tailoring recreation plans to minimize long-term effects to wildlife from disturbance.
 - b) CDFW recommends setting aside conserved acreage of sensitive vegetation communities in a manner that is isolated and free from influence by recreational usage.

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 3 of 13

These conserved areas should be oriented to provide refugia for species that may be flushed or relocated by the presence of trails.

For proposed preservation and/or restoration, the environmental document should include measures to protect the targeted habitat values in perpetuity from direct and indirect negative impacts. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be provided for the long-term monitoring and management of mitigation lands. CDFW recommends that mitigation occur at a state-approved bank or via an entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012), which amended Government Code sections 65965-65968. Under Government Code section 65967(c), the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

- c) Educational materials. Educational materials and signage should be made available to trail users to keep aware of the impacts that human disturbance brings to open spaces. Hikers should be made aware of the impacts that they have on surrounding habitat (such as noise or smells), particularly during breeding seasons.
 - d) Signage. CDFW recommends the County install appropriate public information signage at trailheads to: 1) educate and inform the public about wildlife present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and, 4) provide local contact information to report injured or dead wildlife. Signage should be written in the language(s) understandable to all those likely to recreate and use the trails. Signage should not be made of materials harmful to wildlife such as spikes or glass. The County should provide a long-term maintenance plan to repair and replace the signs.
 - e) Restrictions on recreational use. Restrictions on types of activities allowed in some areas, such as prohibiting dogs or restricting use to trails near active breeding habitat, will aid in minimizing disturbance. Pets should be kept on leash and on trails at all times. Hikers should be encouraged to clean up after their dogs and discourage animal waste as it tends to lead to wildlife avoidance.
 - f) Trash receptacles. Trash receptacles should be placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.
- 2) Tree Replacement. Appendix B-2 (Oak Tree Report) indicates that at least 5 cork oak trees (*Quercus suber*) and 10 coast live oak trees (*Quercus agrifolia*) will be removed and at least 18 other coast live oaks will be impacted (via encroachment) by Project activities. Oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990). As a vegetation community, oak woodlands serve several important ecological functions such as protecting soils from erosion and land sliding; regulating water flow in

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 4 of 13

watersheds; and maintaining water quality in streams and rivers. Oak woodlands also have higher levels of biodiversity than any other terrestrial ecosystem in California (Block et al. 1990). Due to the historic and on-going loss of this ecologically important vegetation community, oak trees and woodlands are protected by local and State ordinances. CDFW considers oak woodlands a sensitive vegetation community.

- a) Oak woodlands. CDFW recommends a qualified botanist identify impacts to oak woodlands. The DEIR should provide a vegetation community map showing where oak woodlands occur in the Project site; where impacts to oak woodlands would occur; and, total acreage of oak woodlands impacted in each separate area. Oak woodlands are structurally diverse vegetation communities. Accordingly, for each area of oak woodland impacted, provide a list of both native and non-native understory plants present. A list should be organized by layer and/or life form such as vine, groundcover, forb, subshrub, shrub, and tree. For each area, also provide the abundance, density, and cover of each plant species and vegetation layer impacted.
- b) Avoidance and Disclosure of Potential Impacts. CDFW recommends the DEIR provide measures to avoid impacts to oak trees and oak woodlands during and after Project construction to the extent feasible. Avoidance measures should be effective, specific, enforceable, and feasible. During the Project, the County should provide measures to fully protect the Critical Root Zone of all oak trees not targeted for removal from ground disturbance activities. The County should also provide measures to protect the outer edge of oak woodlands with appropriate setbacks. After the Project, CDFW recommends oak trees and woodlands be protected by including into the final project design appropriate setbacks between the Project footprint and protected oak woodlands.

For unavoidable Project impacts, adequate disclosure includes providing the following information at a minimum: 1) location of each tree and area of oak woodland impacted shown as a point feature or polygon on a map; 2) scientific (Genus, species, subspecies, or variety) and common name of each tree and understory plant species impacted; 3) the size (diameter at breast height, inches) of each tree impacted; 4) a clear identifier to distinguish heritage trees; 5) acres of oak woodlands impacted; 6) mitigation ratio for individual trees and acres of oak woodlands; 7) total number of replacement trees and acres of oak woodlands; and, 8) total number of replacement trees and appropriate understory species, to occur in suitable on- and/or off-site mitigation lands.

- c) On- or Off-Site Mitigation. CDFW recommends creating or restoring on- or off-site oak woodland habitat at a ratio comparable to the Project's level of impacts to individual oak trees and acres of oak woodland habitat. The DEIR should provide an on- or off-site mitigation plan and discuss the suitability of selected location(s) for mitigating impacts to oak trees and oak woodlands. The mitigation plan should include information about reference sites, with similar species and habitat to the mitigation site, and the suitability of selected reference site(s). Lastly, a mitigation plan should provide specific mitigation goals and actions to achieve those goals to establish self-sustaining oak trees and oak woodlands.
- 3) Nesting Birds. As indicated in the Oak Tree Report, at least 33 on-site trees will be impacted as part of the proposed Project. This vegetation may provide potential nesting habitat where Project activities may impact nesting birds. During 2018 biological surveys reported in the

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 5 of 13

IS, coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), a California Species of Special Concern (SSC), was observed on the Project site. A review of CNDDDB indicates that there are historic observations of coastal California gnatcatcher (*Poliophtila californica californica*), also an SSC, within two and a half miles to the east and west of the project site. Page 32 of the IS acknowledges the potential for impacts to gnatcatcher by stating that, "the [P]roject site is in a larger overall area designated by the USFWS as critical habitat for the coastal California gnatcatcher".

Project activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs, or nestlings, or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.

- a) CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
 - b) Proposed Project activities including (but not limited to) staging and disturbances to native and nonnative vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs.
 - c) If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys. Surveys are needed to detect protected native birds occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
 - d) It should be noted that the temporary exclusion of Project activities within nesting buffers during nesting season may not constitute effective mitigation for the purposes of offsetting Project impacts associated with loss of breeding and nesting habitat. Effective mitigation for impacts to nesting habitat for birds requires structurally (e.g., ground cover, subshrubs, shrubs, and trees) and species diverse vegetation as a part of habitat restoration.
- 4) Impacts to Aquatic and Riparian Resources. The proposed Project is likely to result in loss of riparian habitat. Figure 4: Jurisdiction Delineation on page 8-1 shows that the proposed Project may impact as many as five distinct drainages. The Jurisdictional Delineation provided in the IS estimates that 1.818 acres of streambed are found on the Project site. Waters from the Project site are likely to drain into the Hacienda Channel, which then connects to San Jose Creek and ultimately to the San Gabriel River. Downstream riparian resources may be impacted by water flowing from the Project site.

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 6 of 13

- a) Lake Streambed Alteration (LSA) Agreement. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether an LSA Agreement with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document prepared by the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the DEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA Agreement.
- b) Hydrological Evaluation. As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the DEIR discuss the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
- c) Delineation. The IS identified five drainages within the Project site. A preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the DEIR. The DEIR should evaluate all rivers, streams, and lakes, including culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes.
- d) Changes to Drainage Patterns. Project-related impacts, temporary, and permanent changes in drainage patterns, runoff, and sedimentation should be thoroughly evaluated in the DEIR. Project construction and activities may cause erosion and landslides, resulting in siltation in the stream adjacent to the Project site. Development on top of a hill/in areas with 25 percent or greater natural slopes may have long-term, permanent impacts to the stream and riparian vegetation. Impervious surfaces would divert water, increase runoff, and impact groundwater infiltration.
- e) Oak Trees. Most of the oak trees in the Project site are located on steep slopes. Removing oak trees, or the action of, may temporarily or permanently divert or increase surface water flow, increase slope instability, and increase erosion. CDFW recommends the DEIR thoroughly evaluate and disclose the potential for soil erosion and landslides during and after oak tree removal, and whether this may impact wetland resources during and after the Project. CDFW recommends avoiding impacts to oak trees to avoid or minimize impacts to wetland resources.
- f) Setbacks. In areas of the Project site which may support perennial, intermittent, or ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 7 of 13

drainages. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and after the Project from any future development.

- 5) Habitat connectivity and wildlife movement. Page 33 of the IS states, "the [P]roject site's vegetation communities and habitats contribute to supporting wildlife movement in the Puente Hills (and beyond to the Chino Hills and Santa Ana Mountains) as well as provide a buffer from urban land uses for open spaces to the south of the [P]roject site." Maintaining the Puente-Chino Hills Wildlife Corridor's ecological integrity and bolstering the function of its constituent linkages are widely recognized as important conservation objectives within the densely urbanized Los Angeles Basin (Spencer 2005).

The proposed Project site lies immediately in a vital chokepoint in the Puente-Chino Hills Wildlife Corridor and presents impacts to that corridor beyond the physical loss of space represented in the construction footprint. The current underpass, located just south of Draper Road & Hacienda Boulevard, is believed to drastically underused, likely due to poor visibility, high domestic dog use, lack of natural cover, and poor overall design implementation.

- a) Maintaining wildlife corridors and habitat continuity is essential for wildlife survival and is increasingly important considering habitat loss and climate change. In preparation of the DEIR, CDFW recommends the County conduct studies to document wildlife activity and movement through the Project site. The results, including mapped data, and a discussion of how the Project may affect wildlife movement and dispersal should be provided. The DEIR should also include mitigation measures that would address the reduction of wildlife corridor and impacts to wildlife movement.
- b) Design alternatives should be presented for wildlife crossings along Hacienda Boulevard, found along the eastern edge of the property. The current undercrossing is an L-shaped concrete box tunnel that sees little use beyond raccoons and cats (Haas and Crooks 1999). It lacks many of the design elements that are generally recommended for a successful wildlife crossing of a high-traffic road. Among the commonly recommended elements are:
- A clear line-of-sight from one end of the crossing to the other
 - Fencing to guide wildlife toward the intended crossing and not across the road
 - Providing cover and escape or refuge areas such as piles of brush, stone, or large woody debris should help movement under structure and between preferred habitats

The design of an effective wildlife crossing can vary greatly, just like the locations in which they are implemented. Surrounding habitat, topography, targeted species, and hydrology all need to be considered when designing and implementing a crossing. CDFW recommends consulting the [Wildlife Crossing Structure Handbook Design and Evaluation in North America](#) to generate alternatives for wildlife crossings adjacent to the Project site.

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 8 of 13

- 6) Los Angeles Significant Ecological Areas. The proposed Project would occur among portions of a Los Angeles Significant Ecological Areas (SEA), specifically the Puente Hills SEA (Department of Regional Planning 2019). CDFW recommends the DEIR provide a thorough disclosure, analysis, and discussion of the Project's potential to encroach upon or impact the Puente Hills SEA. Project related impacts include construction and activities, including all staging areas; vehicle and worker parking areas; ingress and egress routes; and areas subject to Project ground disturbing activities. If the Project would impact biological resources within a SEA, the environmental document should be conditioned to provide avoidance and/or mitigation measures.

General Comments

The proximity of the Project site to nearby open space in the Puente Hills increases its potential to serve as supporting habitat for local and migratory wildlife. Preventing the loss of function of these important habitats is imperative in the face of constant urbanization. The following comments should be addressed in the DEIR to reduce the significant impacts that Project related activities may have on the Project area.

- 1) Disclosure. A DEIR should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).
- 2) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated (CEQA Guidelines, § 15126.6). CDFW recommends Regional Planning consider configuring Project construction and activities, as well as the development footprint, in such a way as to fully avoid impacts to rare plants, oak trees, and oak woodlands. CDFW also recommends Regional Planning consider establishing appropriate setbacks from rare plants, oak trees, and oak woodlands. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and from any future development. Project alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6).
- 3) Biological Baseline Assessment. CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site, with emphasis

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 9 of 13

upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific avoidance or mitigation measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures [CEQA Guidelines, §§ 15064, 15065, 15125(c), and 15380]. The DEIR should provide the following information:

- a) Regional setting. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)].
- b) Database search. An updated and thorough assessment of biological resources in nine quadrangles containing the Project site and surrounding areas. A 5-mile radius should be applied for a database search of raptors. CDFW's [California Natural Diversity Database](#) (CNDDDB) in Sacramento should be contacted to obtain current information on any recently reported sensitive wildlife, plants, and sensitive plant communities (CDFW 2020a). In addition, CDFW recommends an updated search for rare plants from Cal flora's [Information on Wild California Plants database](#) (Calflora 2020) and CNPS [Inventory of Rare and Endangered Plants of California database](#) (CNPS 2020b).
- c) Rare plant mapping. An updated and thorough floristic-based assessment of special status plants following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site. Species-specific surveys would identify any areas where these species occur which would help inform plans to fully avoid these areas/impacts and/or appropriate mitigation measures. The DEIR should disclose specific impacts to sensitive plants and habitat and provide measures to fully avoid Project-related impacts.
- d) Sensitive vegetation community mapping. An updated and thorough floristic-based alliance- and/or association-based mapping of sensitive vegetation communities and impact assessments conducted at the Project site and within the neighboring vicinity. The Manual of California Vegetation (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer 2008). CDFW only tracks rare natural communities using the MCV classification system. CDFW considers sensitive vegetation communities as threatened habitats having both regional and local significance. Vegetation communities, alliances, and associations with a state-wide ranking of S1, S2, S3, and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting CDFW's [Vegetation Classification and Mapping Program webpage](#) (CDFW 2020b). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions. The DEIR should fully disclose specific impacts to sensitive vegetation communities and provide measures to fully avoid Project-related impacts.
- e) Wildlife. A complete, recent, assessment of rare, threatened, and endangered, and other

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 10 of 13

sensitive species on site and within the area of potential effect, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). The DEIR should include a nine-quadrangle search of [CNDDB](#) (CDFW 2020a) to determine a list of species potentially present at the Project site. A larger search area may help account for change in species range and distribution, especially due to climate change effects. Seasonal variations in use of the Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Many wildlife species utilize fossorial mammal dens and burrows as habitat structure. Typically, a field survey includes the Project site and a 500-foot buffer. Focused species-specific surveys are required and should be conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable. Acceptable species-specific survey procedures should be developed in consultation with CDFW and USFWS. Survey protocols and guidelines for special status plants and wildlife may be found on [CDFW's Survey and Monitoring Protocols and Guidelines webpage](#) (CDFW 2018).

- 4) Direct, Indirect, and Cumulative Biological Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The following should be addressed in the DEIR:
 - a) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.). Impacts on wildlife corridor/movement areas, including maintenance, staging areas, and access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
 - b) A discussion of potential adverse impacts from lighting, noise, human activity, and exotic species along with identification of any mitigation measures.
 - c) A discussion on any potential Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included.
 - d) An analysis of impacts from land use and zoning designations located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.
 - e) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, including past, present, and anticipated future projects,

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 11 of 13

should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

- 5) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 6) Moving out of Harm's Way. To avoid direct mortality, we recommend that a qualified biological monitor, approved by CDFW, be on-site prior to and during ground and habitat disturbing activities. The biological monitor may need to move any special status species or other wildlife of low mobility out of harm's way that would likely be injured or killed by Project-related construction activities, such as grubbing or grading. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the DEIR clearly identify that the designated entity should obtain all appropriate state and federal permits.

CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's [Scientific Collection Permits webpage](#) for information (CDFW 2020c).

- 7) Non-Native Plants and Landscaping. The Project may involve significant landscaping for aesthetic purposes. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site, similar to species found in adjacent natural habitats.
 - a) If the Project may involve landscaping, CDFW recommends the Draft Environmental Impact Report (DEIR) provide the landscaping plant palette and restrict use of species listed as 'Moderate' or 'High' by the [California Invasive Plant Council](#) (Cal-IPC 2020). These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.
 - b) If non-native invasive plants are on site, CDFW recommends the DEIR provide measures to reduce the spread of non-natives during Project construction and activities. Spreading non-native plants during Project activities may have the potential to impact areas not currently exposed to non-native plants. This could result in expediting the loss of natural habitats in and adjacent to the Project site and should be prevented

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 12 of 13

CONCLUSION

CDFW appreciates the opportunity to comment on the Notice of Preparation to assist the County of Los Angeles Department of Regional Planning in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Andrew Valand, environmental scientist, at (562) 292-6821 or by email at Andrew.Valand@wildlife.ca.gov.

Sincerely,

DocuSignedby:

-u';40.....t) ,;,,,

B6E58CFE24724FS...

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

Ee: CDFW

Victoria Tang, Los Alamitos - Victoria.Tang@wildlife.ca.gov
Andrew Valand Los Alamitos - Andrew.Valand@wildlife.ca.gov
Felicia Silva, Los Alamitos - Felicia.Silva@wildlife.ca.gov
Ruby Kwan-Davis, Los Alamitos - Ruby.Kwan-Davis@wildlife.ca.gov
Frederic Rieman, Los Alamitos- Frederic.Rieman@wildlife.ca.gov
Susan Howell, San Diego - Susan.Howell@wildlife.ca.gov
CEQA Program Coordinator, Sacramento - CEQACommentLetters@wildlife.ca.gov

State Clearinghouse, Sacramento - State.Clearinghouse@opr.ca.gov

Jolee Hui
County of Los Angeles, Department of Regional Planning
December 8, 2020
Page 13 of 13

References

- [Cal-IPC] California Invasive Plant Council. 2020. The Cal-IPC Inventory. Accessed at: <https://www.cal-ipc.org/plants/inventory/>.
- CalFlora. 2020. Information on Wild California Plants. Accessed at: <https://www.calflora.org/>.
- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Accessed at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.
- [CDFWa] California Department of Fish and Wildlife. 2020. California Natural Diversity Database. Accessed at: <https://wildlife.ca.gov/Data/CNDDDB>.
- [CDFWb] California Department of Fish and Wildlife. 2020. Natural Communities. Accessed at: <https://wildlife.ca.gov/Data/NegCAMP/Natural-Communities>.
- [CDFWc] California Department of Fish and Wildlife. 2020. Scientific Collecting Permit. Available from: <https://wildlife.ca.gov/Licensing/Scientific-Collecting#53949678>.
- [CFGc] California Fish and Game Commission. 2020. Policies. Retention of Wetland Acreage and Habitat Values. Accessed: <https://fgc.ca.gov/AboutPolicies/Miscellaneous>.
- Clevenger, Anthony & Huijser, Marcel. 2011. Wildlife Crossing Structure Handbook, Design and Evaluation in North America.
- [CNPSa] California Native Plant Society. 2020. CNPS Rare Plant Ranks. Accessed at: <https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>.
- [CNPSb] California Native Plant Society. 2020. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Accessed at: <http://www.rareplants.cnps.org/>.
- Cowardin, Lewis M., et al. 1970. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.
- Griffin and Muick. 1990. California Native Oaks: Past and Present. *Fremontia* 18(3): 4-12.
- Haas, C. and K. Crooks. 1999. Carnivore Abundance and Distribution Throughout the Puente/Chino Hills. Prepared for The Mountains Recreation and Conservation Authority and State of California Department of Transportation District 8.
- Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.
- Spencer, W.D. 2005. Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor. Conservation Biology Institute for the Resources Legacy Fund Foundation, Sacramento, CA. July 2005.



HAMILTON BIOLOGICAL

December 7, 2020

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

**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).

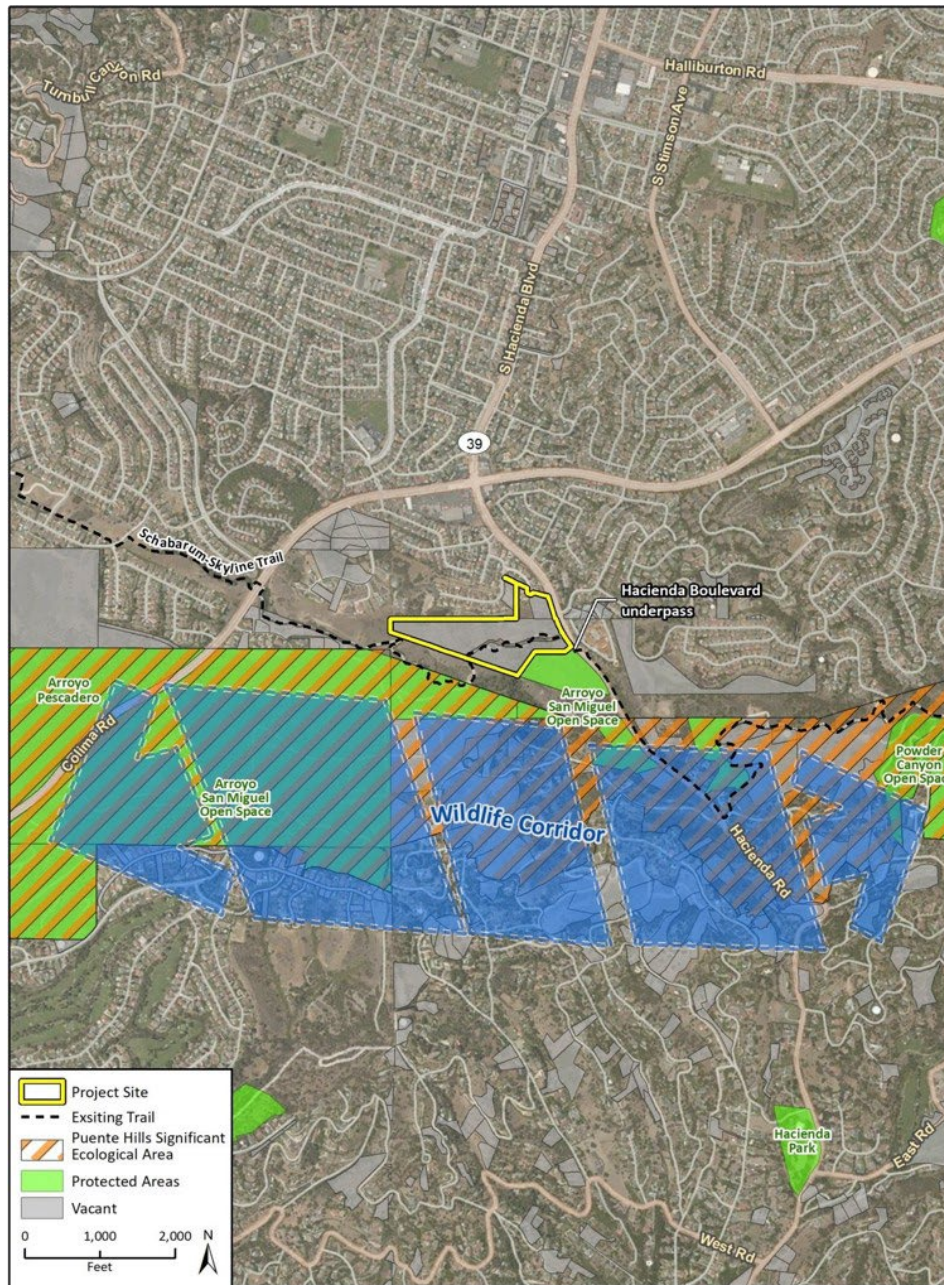
The project site lies at an especially vulnerable location within the Corridor. Figure 1, below, shows that the Corridor’s width narrows markedly in the vicinity of the project site, forming what is known as a “chokepoint” for wildlife movement.



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.



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.

Sincerely,



Robert A. Hamilton
President, Hamilton Biological, Inc.
<http://hamiltonbiological.com>

cc: Erinn Wilson-Olgin, California Department of Fish and Wildlife
Andrea Gullo, Puente Hills Habitat Preservation Authority
Melanie Schlotterbeck, Hills For All

LITERATURE CITED

- Elliott, D., and Stapp, R. 2008. *Effects of a Purpose-built Underpass on Wildlife Activity and Traffic-related Mortality in Southern California: The Harbor Boulevard Wildlife Underpass*. Report dated February 26, 2008, prepared for Puente Hills Landfill Native Habitat Preservation Authority.
- Haas, C., and Crooks, K. 1999. *Carnivore Abundance and Distribution Throughout the Puente-Chino Hills, Final Report-1999*. Report prepared for The Mountains Recreation and Conservation Authority and State of California Department of Transportation.
- Haas, C., and Turschak, G. 2002. *Responses of Large and Medium-bodied Mammals to Recreation Activities: The Colima Road Underpass*. Final report prepared by U. Geological Survey for Puente Hills Landfill Native Habitat Preservation Authority.
- LSA Associates, Inc. 2007. *Resource Management Plan, Puente Hills Landfill Native Habitat Preservation Authority*. Report dated July 26, 2007, prepared for Puente Hills Landfill Native Habitat Preservation Authority.
- Lyren, 2007. *Movement Patterns of Coyotes and Bobcats Relative to Roads and Underpasses in the Chino Hills Area of Southern California*. MS Thesis, California Polytechnic University, Pomona.
- Spencer, W. D. 2005. *Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor*. Final report dated July 2005 prepared by the Conservation Biology Institute for the Resources Legacy Fund Foundation, Sacramento, CA.
- Stapp, R., and Cashin, S. 2009. Final Report: Continued Monitoring of Harbor Boulevard Wildlife Underpass. Report dated December 10, 2009, prepared for Puente Hills Landfill Native Habitat Preservation Authority.

Whittier Daily News

Hacienda Heights residents debate Hsi Lai Temple expansion plan

By [Mike Sprague](#) | msprague@scng.com | Whittier Daily News

PUBLISHED: November 20, 2020 at 1:22 p.m. | UPDATED: November 21, 2020 at 1:01 p.m.

[Hacienda Heights' Hsi Lai Temple's proposed 143,671 square-foot expansion](#) came under fire from local residents and the agency charged with managing the nearby hills but also received support Thursday at a "scoping hearing" to seek input on what should be included in the environmental impact report for the project.

Nearly 130 people took part in the Zoom virtual hearing to discuss the International Buddhist Society's plans that call for 17 buildings including dorms, residential buildings, cafeteria, tea room, meditation hall and classrooms on 30 acres west of Hacienda Road.

A seven-level subterranean parking garage also would be built, along with two pedestrian pathways connected to the western portion of the existing off-site access way.

Andrea Gullo executive director for the Puente Hills Habitat Authority, said the project would be "tremendously harmful" to the environment and wildlife corridor.

"This project could potentially defeat the purpose of all of the years of work by this agency due to the environmental impacts," Gullo said,

"There will be significant biological impacts," she said. "We're deeply concerned that the project, including all of its buildings, its trails and especially the traffic, will cut off the wildlife movement between open space areas, decrease biological diversity and negatively impact the habitat used by the federally protected California gnatcatcher found to the immediate east and west of the project."

Burt Jeremy Allred said he likes the project.

"I highly suggest some type of development there because it is an eyesore," Allred said.

"I don't have concerns about a large volume of traffic to a monastery," he said. "I don't have concerns about the significant impact on biodiversity. I'd much rather this than more Edison electrical poles."



Shown is a map of the Hacienda Heights' Fo Guang Shan Hsi Lai Temple's proposed 143,671 square-foot expansion. Courtesy Los Angeles County

The temple has been a mainstay on the east side of the road since it was built in 1988. It is one of the largest Buddhist temples in North America, according to the temple website. The temple has hosted numerous local and international events, including Chinese Spring Festival which, during its two-week period, welcomes an average of 20,000 visitors per day.

The complex encompasses 15 acres and a floor area of over 100,000 square feet.

Officials from the temple didn't return phone calls made this week seeking comment.

Traffic was a key part of the debate.

Chris Richard said traffic issues shouldn't be blamed on the monastery because the issue goes back decades.

However, Maury Edwards was concerned,

"Hacienda Road is a very narrow road, particularly once you get south of Colima," Edwards said. "If we start to pick up traffic south from the facility, that road will not handle it and it'll collapse again at the bottom of the canyon like it did a year ago.

He was referring to the nearly year-long closure in 2019 and 2020 from Canada Sombre Road to West Skyline Drive in La Habra Heights because a section was in danger of a landslide. It has since been repaired.

Henry Pedegron of Hacienda Heights said the temple is good for the community.

"It put Hacienda Heights on the map and to me this will make us a more attractive place to live," Pedegron said.

"I don't think it will be a source of attraction," he said, "It's more of a mediation type of facility. The traffic is not going to be as hectic as you think it is. You can't blame any (problems) on the monastery."

Figure 2 Project Site Location



Shown is a map of the area where Hacienda Heights' Fo Guang Shan Hsi Lai Temple's proposed 143,671 square-foot expansion would go. Courtesy Los Angeles County

Initial Study

Julie Tan like the idea of a new trail and the temple itself,

"We like having some place we can go where we have friends," Tan said. "We're really proud of it."

Juan Reynoso said he doesn't understand the need for the expansion,

"It's smack dab in a wildlife corridor," Reynoso said, "It's one of the last links remaining between Los Angeles County and north Orange County. Why is it needed?"



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



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.

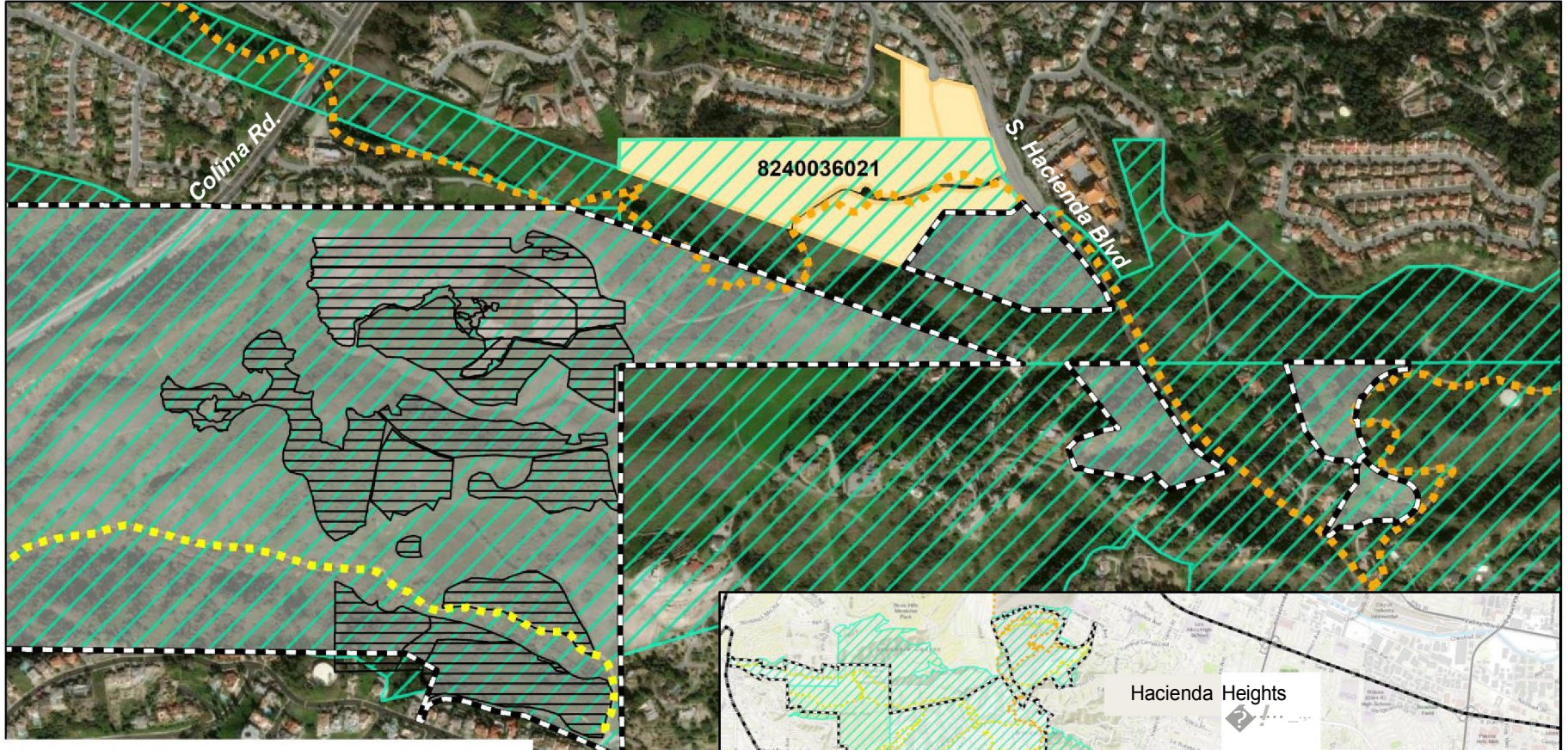
As a global comment, the maps in the DEIR that indicate land owned and managed by the Habitat Authority should say "Puente Hills Preserve", not "Arroyo San Miguel Open Space" or some other label.

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).

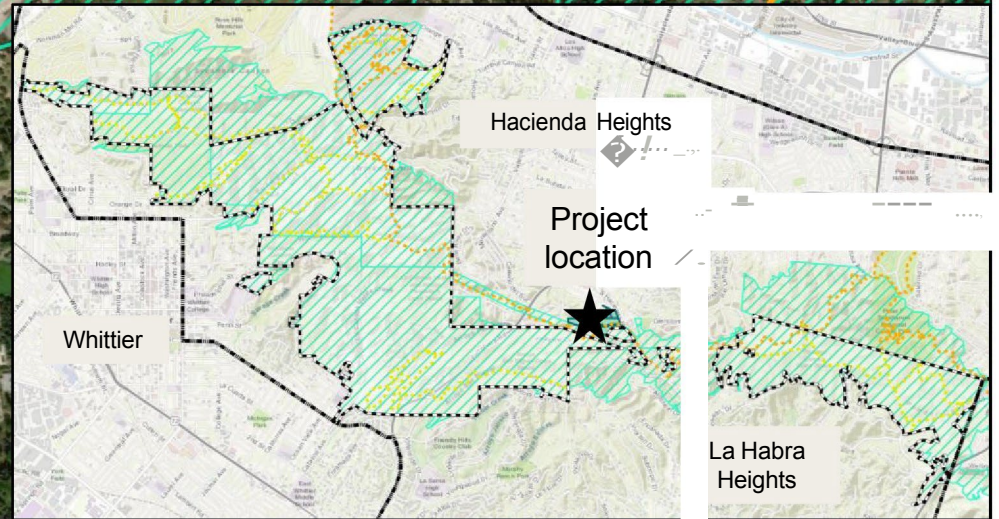
**Figure 1. Puente Hills Preserve and vicinity
Los Angeles County**

Created: November 2020

0 0.125 0.25 0.5 Miles



- Legend**
- Ci**, ¹Habitat Authority Jurisdictional Boundary
 - C**] Puente Hills Preserve Boundary
 - Habitat Authority-managed trail
 - LA County-managed trail (current)
 - g Mitigation restoration site (coastal sage scrub)
 - LA County Significant Ecological Area
 - Hsi Lai monastery site parcels



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.

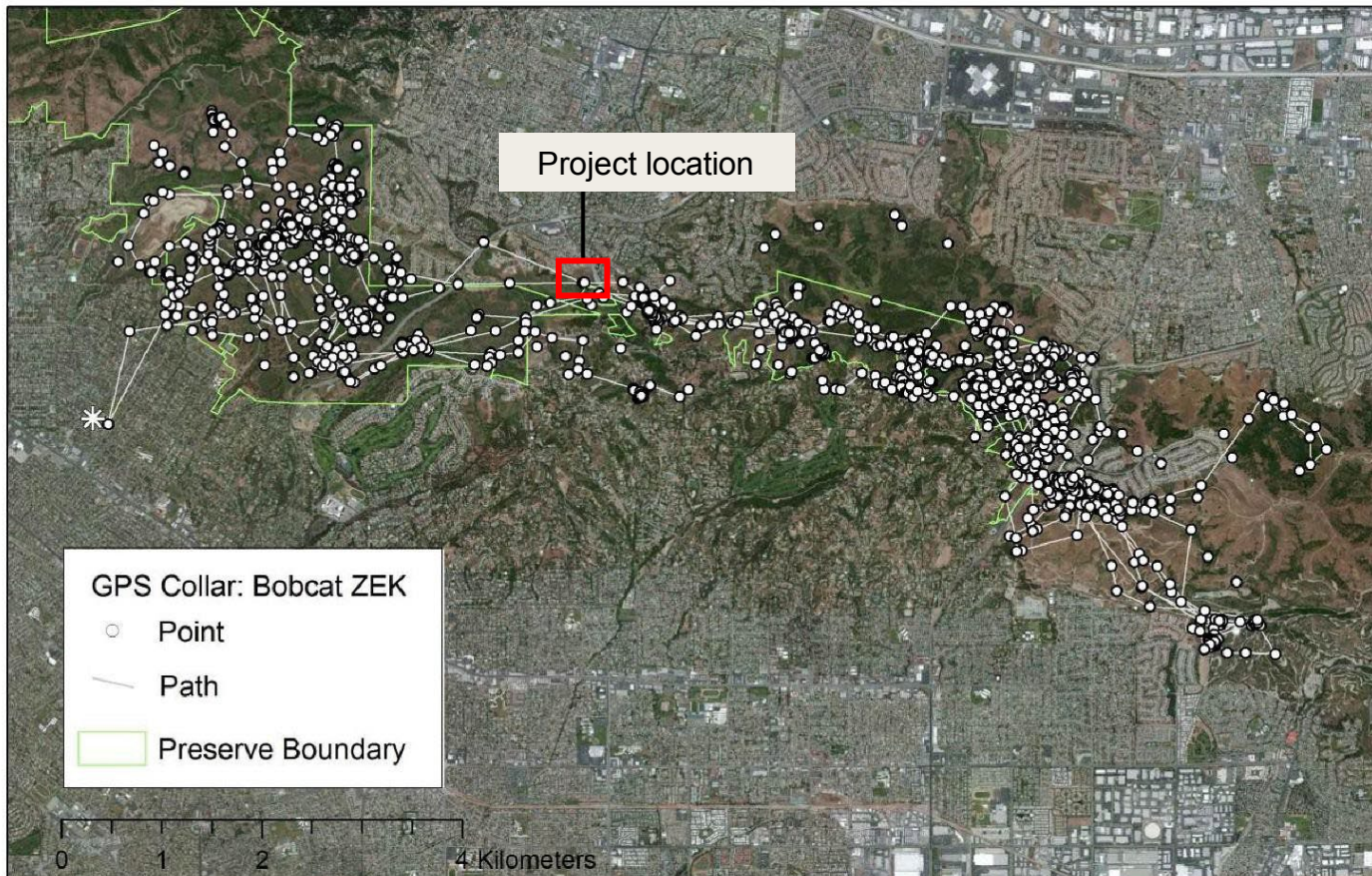


Figure adapted from United States Geological Survey. 2013. Assessment of human impacts on habitat and connectivity for the conservation of bobcats and other wildlife in the Puente Hills. Year 1 report. (Figure 5)

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.

Haas, C.D. 2000. Distribution, relative abundance, and roadway underpass responses of carnivores throughout the Puente-Chino Hills. M.S. Thesis. California State Polytechnic University, Pomona, CA. 110 pp.

Haas, C.D., and K. Crooks. 1999. Carnivore abundance and distribution throughout the Puente/Chino Hills. Final Report. Prepared for The Mountains Recreation and Conservation Authority and State of California Department of Transportation.

LSA Associates. 2007. Resource Management Plan, Puente Hills Landfill Native Habitat Preservation Authority. July. <http://www.habitatauthority.org/resource-management-plan/>

Remington, S. 2006. Bat Surveys of the Puente Hills, Los Angeles County, California. Costa Mesa, California.

Shannon, G., M.F. McKenna, L.M. Angeloni, K.R. Crooks, K.M. Fristrup, E. Brown, K.A. Warner, M.D. Nelson, C. White, J. Briggs, S. McFarland. 2015. A synthesis of two decades of research documenting the effects of noise on wildlife. *Biological Reviews*. 91(4):982-1005.

[USGS] 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. *Unpublished data*.



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETING

DATE: October 28, 2020

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations and, Interested Parties

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report (EIR) in Compliance with Title 14, Section 15082(a) of the California Code of Regulations.

The County of Los Angeles (“County”) is the lead agency pursuant to the California Environmental Quality Act (“CEQA”) and intends to prepare an EIR for the proposed project identified below. The County has prepared this Notice of Preparation (“NOP”) to provide Responsible Agencies and other interested parties with information describing the project and to identify its potential environmental effects pursuant to State requirements.

AGENCIES: The County requests your agency’s views on the scope and content of the environmental information relevant to your agency’s statutory responsibilities in connection with the proposed project, in accordance with Section 15082(b) of the CEQA Guidelines. Your agency will need to use the EIR prepared by the County when considering any permits that your agency must issue, or other approval for the Project.

ORGANIZATIONS AND INTERESTED PARTIES: The County requests your comments and concerns regarding the environmental issues associated with construction and operation of the proposed project.

**PROJECT &
PERMIT(S):**

Hsi Lai Monastery Site

Project No. **2018-000207-(4)** Conditional Use Permit (“CUP”) No. RPPL2019000532, Oak Tree Permit No. RPPL2019000545, Environmental Plan No. RPPL2019002651

**PROJECT
APPLICANT:**

International Buddhist Progress Society (IBPS)

PROJECT 15866 Draper Road, Hacienda Heights, CA 91745 (west of South
LOCATION: Hacienda Boulevard, directly across the Boulevard from the existing Fo
Guang Shan Hsi Lai Temple (“Temple”) at 3456 Glenmark Drive). APN:
8240-036-021, 8291-035-020, and 8291-035-021



NOTICE OF SCOPING MEETING: The County will conduct a virtual public scoping meeting for the purpose of soliciting oral and written comments from interested parties as to the appropriate scope and content of the EIR.

All interested parties are invited to attend the virtual scoping meeting to assist in identifying issues to be addressed in the EIR. The scoping meeting will include a brief presentation of the Project to be addressed in the EIR and will provide attendees with an opportunity to provide input to the scope of the EIR.

| | |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| VIRTUAL SCOPING MEETING: | <p style="text-align: center;">Thursday, November 19, 2020 6:00 PM – 8:00 PM Via Zoom Meeting Visit http://planning.lacounty.gov/case/view/2018-000207 for more information</p> |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

PROJECT DESCRIPTION: The applicant, IBPS, proposes the development of a monastery retreat center with associated accessory uses. The project would involve the development of 17 buildings concentrated on the northern portion of the site (APN 8240-036-021) with a combined total of 143,671 square feet of programmed space, and

including the renovation of one existing 5,318 square-foot residential building into a volunteers' dormitory (APN 8291-035-021). The remaining portion of the site (APN 8291-035-020) would remain undeveloped except for new landscaping and walkways. The use of the proposed buildings would be meditation halls of various sizes, classrooms and other instructional spaces, dormitories of various sizes, administrative offices and multifunctional recreational spaces. The project would include two proposed driveways along South Hacienda Boulevard, and a new multi-use 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 (266 spaces in a seven-level subterranean garage, 15 on-street spaces designated along project access driveway, 12 spaces in ground-level garages for dormitory occupants, and 4 spaces in existing building for volunteers' dormitory). 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, consistent with the metrics established in the County's Hillside Design Guidelines. The Project would require approval of a 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 are also requested.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT: Based on a preliminary review of the proposed Project consistent with Section 15060 of the CEQA Guidelines, the County has determined that an EIR should be prepared for this proposed Project. In addition, consistent with Section 15082 of the CEQA Guidelines, the County has identified the following probable environmental effects of the Project, which will be addressed in the EIR:

- Aesthetics
- Biological Resources
- Cultural Resources
- Geology/Soils
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Noise
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Wildfire

The County has determined that there is not a likelihood of potentially significant effects related to the following environmental topics:

- Agriculture/Forestry Resources
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Land Use/Planning
- Mineral Resources
- Population and Housing
- Utilities and Service Systems

The EIR will include information on the reasons why these effects were determined not to be significant and are therefore not addressed in detail in the EIR.

PUBLIC REVIEW PERIOD: The County has determined to make this NOP available for public review and comment pursuant to Section 15082(b) of the CEQA Guidelines. The comment period for the NOP begins on Wednesday, November 4, 2020 and ends on Tuesday, December 8, 2020.

Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the EIR.

Written comments must be received or postmarked by December 8, 2020. Please send your written comments (emails preferred) at the earliest date possible to the following:

| | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| County of Los Angeles Department of Regional Planning Zoning Permits East Section 320 West Temple Street, 13 th Floor Los Angeles, CA 90012 Attn: Jolee Hui c/o Ed Rojas (NOP Comments) | E-Mail: jhui@planning.lacounty.gov Phone: 626-923-9839 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|

All written responses will be included as Appendices in the Draft EIR and their contents considered in accordance with State and County environmental guidelines.

DOCUMENT AVAILABILITY: The NOP and Initial Study are available for public review at the Department of Regional Planning's website at:

<http://planning.lacounty.gov/ceqa/notices>

Thank you for your participation in the environmental review of this project.

Si necesita más información por favor llame al (213) 974-6411.

若您有任何疑問或需要中文翻譯，請電郵至 jhui@planning.lacounty.gov 與 Jolee Hui 聯絡。