



Puente Hills Landfill
Native Habitat Preservation Authority

August 29, 2007

County of Los Angeles
Department of Regional Planning
General Plan Development Section
Attn: Mark Herwick, General Plan Section Head
320 West Temple Street
Los Angeles, CA 90012

Comments on Draft Los Angeles County General Plan

Dear Mr. Herwick:

The Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the draft General Plan.

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 our 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 will endeavor to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority's jurisdiction extends within eastern Los Angeles County approximately from the intersection of the 605 and 60 Freeways in the west to Harbor Boulevard in the east. The Habitat Authority owns and or manages 3,860 acres which lie within the Cities of Whittier and La Habra Heights as well as in the County unincorporated area of the Puente Hills known as Hacienda Heights and Rowland Heights.

Proposed Puente Hills Significant Ecological Area (SEA) Delineation:

The Habitat Authority supports in concept the proposed expansion of the Puente-Chino Hills Significant Ecological Area (SEA), and we support our properties being included within the SEA. The County's efforts to propose protection of wildlife habitat as a part of the land use element in the general plan are commendable. In order to maintain the integrity of the scientific work conducted, we recommend that the boundaries of the SEAs proposed by County consultants (PCR 2000) not be reduced even outside of the unincorporated area without further scientific evidence to support that change. In addition, there are several areas for which the biological evidence supports their inclusion within this SEA.



The open space of the Puente Hills between Harbor Blvd. and State Route 57 has been previously shown to be of great conservation concern to the entire Puente-Chino Hills corridor, both for its value in linking the west and east corridor (cite: Missing Middle) as well as because of its intrinsic value in supporting significant populations of sensitive animal species.

The current boundaries of the proposed Puente Hills Significant Ecological Area purport to encompass the significant open space of this portion of the hills, but as currently drawn, they omit a critically-important portion of the open space in unincorporated Los Angeles County: the southwestern corner of the Aera project area, which extends east from Harbor Blvd.

An aerial photo of the area in question is in Figure 1. This shows well the mosaic of habitat dominated by extensive, intact grassland (native/non-native mix), which appears tan in color. Southern California black walnut woodland (dark green) and coastal sage scrub (gray-green, lower right) comprise the other two main habitat types.



Figure 1. "Aera" region of Puente Hills.

The proposed boundaries of the SEA are reproduced in Figure 2 (in green). This configuration clearly excludes the entire southwestern corner of the Aera project area (lower left), which is marked with a red arrow in Figure 3.

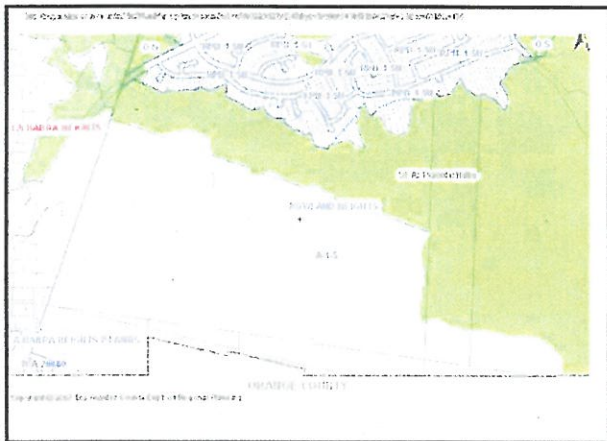


Figure 2. Map of Aera project portion of Puente Hills SEA, from Los Angeles Co. General Plan update.

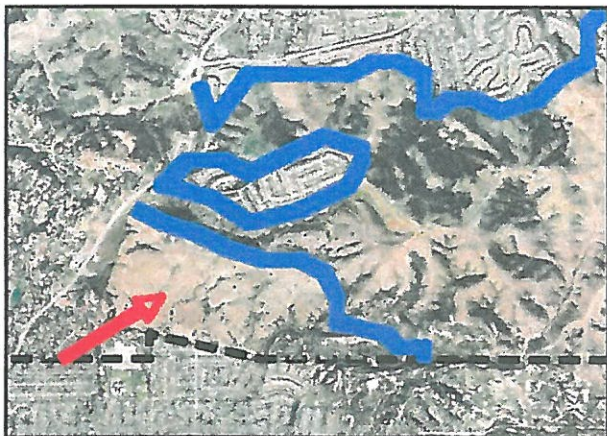


Figure 3. Red arrow denotes "missing corner" of Aera project area, a region of high-quality habitat currently excluded from coverage. Blue lines show proposed boundaries of SEA

The decision to omit this area from the SEA is puzzling, especially because it exhibits features consistent with the rest of the SEA, and even supports species that are extremely localized and declining region-wide, which are presumably of great conservation concern.

Though the wording of the Los Angeles County General Plan update regarding SEAs is vague ("Conservation and Open Space" section, p. 118), a more detailed definition was provided by PCR (2000), listing six main criteria, of which the Puente Hills met four.

The criteria which it met are also satisfied by the inclusion of the omitted Aera project site, namely:

- Biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution (both a, regional and b, county-wide).

- Habitat that at some point in the life cycle of a species or group of species, serves as concentrated breeding, feeding, resting or migrating grounds and is limited in availability.
- Areas that would provide for preservation of relatively undisturbed examples of the original natural biotic communities of Los Angeles.

The breeding bird species of the Puente-Chino Hills were treated by Cooper (2000), who identified three key areas most important for bird conservation in the range; two of these are located in the southwestern Aera region, *including in the portion excluded by the current boundaries*. These include the extensive grassland between Harbor Blvd. and State Route 57, and the coastal sage scrub of north Brea/west Yorba Linda.

The extensive grassland of the Aera site is unique in the Puente Hills; no other comparably large grassland remains in the Los Angeles Basin. Therefore, it is extremely important for grassland obligate species such as White-tailed Kite, Grasshopper Sparrow, and others. Despite the admixture of non-native grasses in the system, this habitat is very robust, and supports countless patches of native species, even where grazed.

The coastal sage scrub along the southeastern corner of the Aera site is an extension of what is arguably the highest-quality stand of this habitat in the entire Puente-Chino Hills, that along the northern border of the City of Brea (Orange Co.). This habitat, which also includes extensive Cactus Scrub, was found to support a robust population of the Federally-threatened California Gnatcatcher, among many other sensitive species (see below).

Southern California black walnut woodland, considered a sensitive natural community and wholly restricted to the hills surrounding the Los Angeles Basin, is probably best developed in the eastern Puente Hills (LSA 2007), including the Aera property. Prior to grazing, this habitat was probably more extensive in the "missing" Aera piece.

In a review of the status of sensitive nesting bird species of the hills (Cooper 2000:230-232) identified 18 species considered regionally-declining and at high risk of local extinction along the Puente-Chino Hills Corridor. Most of these are found within this Aera portion of the hills, including some that reach their maximum abundance in Los Angeles County here.

Notable among these are the following species:

Northern red diamond rattlesnake *Crotalus ruber ruber*

California Reptile Species of Special Concern

This animal reaches the northern global extent of its range in south-facing slopes of the Whittier Hills (Haas et al. 2002), and the Aera site presumably supports this taxon, as it occurs just to the east above Yorba Linda (pers. obs.).

White-tailed Kite *Elanus leucurus*

California Bird Species of Special Concern

Kites, presumably breeding locally, were a common site during spring/summer surveys in this area in the late 1990s; this species is effectively at the northern edge of its range in the Puente-Chino Hills in the Harbor Blvd. area, with perhaps a single pair to the west (in Powder Cyn.).

Golden Eagle *Aquila chrysaetos*
California Bird Species of Special Concern

The only Golden Eagles observed perched in the Puente-Chino Hills during breeding surveys in 1997-98 were an adult and a juvenile observed in the Aera site, just off the eastern border of the omitted piece. These birds were detected on 24 May 1997, and presumably were the same birds that have been documented nesting near Chino Hills State Park to the east.

Loggerhead Shrike *Lanius ludovicianus*
California Bird Species of Special Concern

The Aera property may represent the last hope for breeding shrikes in the Los Angeles Basin; a recent survey (2005) conducted by the Los Angeles Co. Museum of Natural History (which did not include the Puente Hills) found no breeding pairs, yet two were on the Aera property on 31 May 1997 (Cooper, unpubl. data), suggesting breeding at least then. The habitat - rolling hills with grassland - is ideal for this species.

California Gnatcatcher *Polioptila californica californica*
Federally Threatened

The largest population of this taxon in the Puente-Chino Hills is in the band of scrub from just east of Harbor Blvd. (incl. the Aera site missing from the proposed SEA), east into Yorba Linda in Orange Co. (visible in gray-green at the lower left of Fig. 3). Several dozen acres of this habitat appears to have been left out of the SEA. This population is presumably the source population for subpopulations farther west along the hills, including several pairs along Arroyo San Miguel (vic. Colima Rd.). Further degradation of the open space between these two groups could have detrimental effects on both populations.

Southern California Rufous-crowned Sparrow *Aimophila ruficeps canescens*
California Bird Species of Special Concern

Very common throughout site (and throughout hills).

Bell's Sage Sparrow *Amphispiza belli belli*
California Bird Species of Special Concern

This California-Baja endemic is known in the Puente Hills only from a single (juvenile) individual observed along the eastern edge of the missing Aera corner on 24 May 1997 (Cooper, unpubl. data). This species is strongly tied to undisturbed coastal sage scrub and Chamise chaparral in our area, and, like the Loggerhead Shrike, may be extremely dependent upon this habitat on the Aera site for its persistence in the Los Angeles area. The nearest Los Angeles County populations are vic. Claremont, along the foothills of the San Gabriel Mtns. (possibly extirpated) and at Castro Peak in the western Santa Monica Mtns.

Western Grasshopper Sparrow *Ammodramus savannarum perpallidus* California Bird
Species of Special Concern

Known from just a handful of areas in the Puente Hills, this range is arguably the most important site for this species in Los Angeles County. The largest population in the hills by far is located in the grassland between Harbor Blvd. and the 57 Fwy. (20+ birds in 1997, D. Cooper unpubl. data). They would be expected to occur in grassland on the southwestern corner as well. Just west of here, a breeding colony of this species was also present (<5 pr.) in the southeastern portion of Powder Canyon along the Schabarum Trail, and on a grassy ridge just south of Turnbull Canyon. (Skyline Trail).

A major study (Resource Management Plan, Puente Hills Landfill Native Habitat Authority, LSA and Associates 2007) compiled much of the pertinent information on the sensitive wildlife and plants of the Puente Hills within the Habitat Authority's jurisdiction. Notably absent from the proposed boundaries of the SEA is the entire extent of "Core habitat" which was delineated by the Habitat Authority within its Resource Management Plan located west of Colima Rd. This large parcel, now managed by the Habitat Authority, is contiguous to habitat known to support some of the most imperiled species of the Puente Hills, including the federally-threatened California Gnatcatcher and such California species of special concern as coastal populations of the Cactus Wren *Campylorhynchus brunneicapillus*, the latter having suffered widespread extirpations in recent years. These areas should be included within the SEA.

Also, please consider for inclusion other biologically rich lands owned or managed by the Habitat Authority at the top of the Turnbull Canyon watershed. There are several other parcels adjacent to Habitat Authority properties in this area than warrant inclusion into the SEA due to habitat importance (Figure 4). This is an area that was found to support several rare plants, including Plummer's Mariposa-Lily *Calochortus plummerae* and the western spadefoot *Spea hammondi* (described in the RMP). However, the proposed SEA would actually reduce the coverage of this important upper watershed zone. In this case, we recommend that at the least, the existing SEA boundary remain in place.

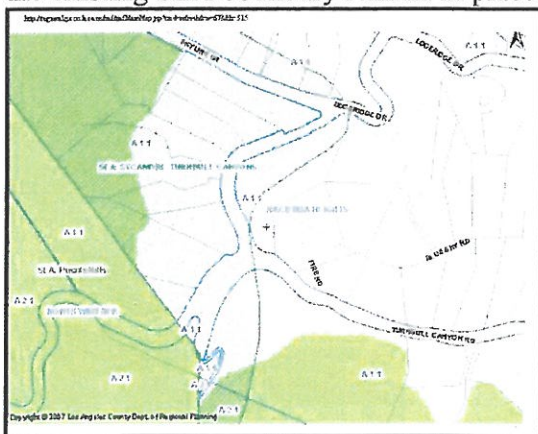


Figure 4. Hacienda Heights Area, showing pale green shaded area formerly included in the Puente Hills SEA.

While in general, the Habitat Authority welcomes the SEA designation over its properties, please consider deletion of the developed area of Sycamore Canyon from the proposed SEA designation. The Habitat Authority is considering installing a small office in between two

existing buildings at this location where there would no impacts to the native landscape or environment. This physical presence would enable us to better manage this and other sensitive habitat areas in the western Puente Hills.

Habitat Authority would welcome the opportunity to meet with County staff to discuss any of these matters in further detail.

Proposed Puente Hills SEA Description:

In addition, please note the following changes to the current description for the Puente Hills SEA.

On Page 1 of the Puente Hills Description– Paragraph 4- Please note that there are key regional habitats represented in the Puente Hills such as southern California black walnut woodland.

Page 2, Paragraph 1- Oak woodland is prevalent in the Hacienda Hills as well.

Paragraph 2 - Oak Riparian woodland is not extensive in Powder Canyon. Powder Canyon is a mostly arid drainage that does not have the riparian elements of many other drainages in the hills. The classic oak-willow-sycamore canopy and the dense, herbaceous understory typical of this habitat is absent from most of Powder Canyon.

Paragraph 4 – Please reevaluate the description of willow scrub. It is our understanding that willow scrub has dense understory, composed of Mulefat and Sandbar Willow *Salix exigua*.

Paragraph 5 – Please replace the word "robust" with "high in stature," "high, evergreen" or something else - most habitats have robust species, even non-native grassland.

The western limit of "mixed chaparral" in the Puente Hills extends to about Powder Canyon, and is dominated by the species listed, as well as by Scrub Oak (*Q. berberidifolia*), with subdominants of Chamise, *Cercocarpus*, and *Ceanothus*; Laurel Sumac is uncommon. The chaparral-like habitat prevalent west of Powder Canyon is better termed "sumac scrub", and is dominated by the species listed in the paragraph 5 of page 2; Laurel Sumac, for example, is common and dominant in sumac scrub

Page 2, Paragraph 5 (continued on page 3) - Mixed Chaparral is widespread in the eastern Puente Hills, and Sumac Scrub is widespread in the western Puente Hills - I would not single out individual drainages (Sycamore Canyon, etc.) here.

Page 3, Paragraph 1 - Coastal sage scrub is very robust. Maybe write "short in stature" to distinguish it from chaparral. Please note that cactus scrub forms a very important subunit of coastal sage scrub, and is extensive on southerly and westerly slopes, including Sycamore Canyon, Hellman Park, and the entire La Habra Heights area. These patches represent some of the best examples of cactus scrub in the entire county, and should be noted as such.

Paragraph 2 - Non-native grassland is extensive in three important areas of the Puente Hills; along the Skyline Trail south of Turnbull Canyon, vic. Powder Canyon, and south of Rowland

Heights ("Aera" property). This habitat supports a variety of sensitive plant and animal species (e.g., Catalina Mariposa-Lily *Calochortus catalinae*, Grasshopper Sparrow, Western Spadefoot), and is not degraded as portrayed here.

Paragraph 3 - Freshwater marsh is restricted to the San Bernardino County portion of upper Tonner Canyon, both north and south of Grand Ave. (easily visible from road); no actual freshwater marsh habitat exists within this SEA in Los Angeles Co., though there is substantial freshwater marsh to the west, within Whittier Narrows.

Paragraph 5 - Invertebrates were investigated by LSA (2005), who documented several scarce butterflies, including California Dogface *Colias eurydice*, Western Tailed-Blue *Everes amyntula*, and Mormon *Apodemia mormo* and Fatal *Calephelis nemesis* Metalmarks. These are scattered throughout the hills.

The herpetofauna of this SEA was investigated by Haas et al. (2002) and LSA (2005), who found the hills to support several locally-rare and/or sensitive species, including Western Spadefoot (one recent record vic. Skyline Trail south of Hacienda Hts.), Arboreal Salamander *Aneides lugubris* (Whittier Hills, Powder Cyn.), two species of slender-salamander (*B. nigriventris* and *B. major*; widespread), Coastal Western Whiptail *Cnemidophorus tigris* (widespread), Red Diamondback Rattlesnake *Crotalus ruber* (localized), and Western Blind Snake *Leptotyphlops humilis* (Powder Cyn.).

Page 4, Paragraph 1 - Sensitive mammals (LSA 2005) include the Desert Woodrat *Neotoma lepida* and habitat specialists like the Cactus Mouse *Peromyscus eremicus* (Whittier Hills) and the Western Gray Squirrel *Sciurus griseus* (Powder Cyn.).

The Puente Hills is extremely important for bats, and 11 species were documented here during a recent study (Remington 2006), including such sensitive species as Yuma myotis *Myotis ymanensis*, western red bat *Lasiurus blossevillii*, western yellow bat *Lasiurus xanthinus*, hoary bat *Lasiurus cinereus*, pallid bat *Antrozous pallidus*, pocketed free-tailed bat *Nyctinomops femorosaccus* and western mastiff bat *Eumops perotis*.

Page 4 – Paragraph 2 –The Mountains Recreation and Conservation Authority (a joint powers of the Santa Monica Mountains Conservancy) working with the Wildlife Corridor Conservation Authority commissioned the study of wildlife movement in Puente Hills.

Page 5 - A major study (LSA 2007) compiled much of the pertinent information on the sensitive wildlife and plants of the Puente Hills within the Habitat Authority's jurisdiction. The federally Threatened California Gnatcatcher occurs in at least two areas of the hills, vic. Arroyo San Miguel east of Colima Dr. and a smaller, possibly irregular population along Sycamore Canyon in the western Puente Hills. These represent some of the last locales for this bird in the Los Angeles Basin, and some of the farthest-north individuals of the species.

This range is notable as holding among the last known populations in the Los Angeles area for several taxa that are considered California Species of Special Concern and/or that are nearly extinct locally, and through recent biological monitoring, we are discovering additional

protected species every year, including the federally Endangered Least Bell's Vireo, detected in 2005 and 2007 and possibly rare summer resident. It is not a coincidence that many of these species are grassland or coastal scrub specialists; these habitats have been virtually eliminated in the Los Angeles Basin, but persists in a reasonably intact state in the Puente-Chino Hills (Cooper 2000).

Proposed SEA Ordinance:

From time to time the Habitat Authority will propose improvements to the open space such as low impact recreational trailheads, trails, wildlife road underpasses, or fences to limit illegal off-road activity on protected preserve areas. Our intentions with these and similar projects are to design them around the existing biological resources to ensure the resources will continue to function and even flourish. We recommend that open space management activities of this nature be considered as compatible and appropriate within a SEA. More specifically, we recommend that language be added into the SEA Ordinance allowing public land preservation agencies with adopted management plans to carry out all activities that contribute the mission of their agency.

Circulation:

In regards to Figure 4.6, Adopted and Proposed Scenic Corridors, we support the existing candidacy of Colima Rd., Hacienda Rd., Harbor Blvd., and the 57 Freeway as scenic corridors. In addition, we support adding Turnbull Canyon Rd., as a proposed scenic corridor.

Conservation & Open Space Element:

We commend the County for its efforts in protecting the last remaining open space areas in the Los Angeles Basin. In regards to Figure 5.1, Open Space, we will support the inclusion of the unincorporated Authority owned/managed lands to be designated as Other Park and Conservancy Land. Currently some of the unincorporated properties we own/manage are indicated as such, but not all of them. Please contact the Habitat Authority staff for a map of Habitat Authority owned/managed lands in GIS at your convenience.

In regards to Figure 5.2, Trail Network, missing is the existing Los Angeles County Schabarum Trail through the Puente Hills. Please include this trail and its connector trails, as well as adopted trails of the Habitat Authority which can be designated as Existing Official Trails on Public Lands Trail Network. Please contact the Habitat Authority staff for a map of these trails in GIS at your convenience.

In regards to the Biological Resources: Urban-Wildland Interface (page 123), we recommend that its definition include the following italicized language "...where the edge of the forest *and other publicly owned open space* lands meet development..." The Habitat Authority's adopted Resource Management Plan addresses urban edge issues, and we also have produced a DVD regarding urban edge issues, both intended to protect the Puente Hills' biotic, watershed, aesthetic and recreational resources. Edge issues are not unique to the forest.

Safety:

On page 164, please add to Goal S-2: Coordination with other public agency emergency planning and response activities.

Furthermore, the General Plan should address the issue of compatibility of roadways with wildlife in the Circulation and Conservation and Open Space Elements, not exclusively in the section dealing with Significant Ecological Areas. Issues to address include the restriction of wildlife movement, the increase in wildlife mortality with roadways, and the threat of public safety with vehicular-wildlife collisions. The draft General Plan should include measures such as wildlife underpasses, overpasses, fencing, or signage to address these conditions during the continued operation of existing roadways, for new roadway development, and for other development that would significantly increase traffic on roadways, near natural and wildland areas.

Please add us to the mailing list for the draft General Plan and all associated documents when they are made available for public review. Thank you for your consideration of our comments. Again, we would like to meet with County staff to further discuss these issues at your convenience. Feel free to contact me or Andrea Gullo, Executive Director, at (562) 945-9003 for further discussion.

Sincerely,



Bob Henderson
Chairman

cc: Board of Directors
Citizens Technical Advisory Committee

Sources Cited:

Cooper, D.S. 2000. Breeding landbirds of a highly-threatened open space: The Puente-Chino Hills, California. *Western Birds* 31(4):213-234.

Haas, C.D., A.R. Backlin, C. Rochester, and R.N. Fisher. 2002. Monitoring reptiles and amphibians at longterm biodiversity monitoring stations: The Puente-Chino Hills. USGS Western Ecology Research Center. Final report. Sacramento, California.

LSA Associates, Inc. 2005. Dragonfly, Butterfly, and Vertebrate Species Matrix for the Puente Hills Landfill Native Habitat Preservation Authority Lands, Results of Multispecies Surveys and Pitfall Trapping, Irvine, California.

LSA Associates, Inc. 2007. (Draft) resource management plan. Puente Hills Landfill Native Habitat Preservation Authority. (May 2007) July 2007. Irvine, California.

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Remington, S. 2006. Bat surveys of the Puente Hills. Final report. Costa Mesa, California. July 2006.