

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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December 20, 2002

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County of Los Angeles
Department of Regional Planning
Attn: Mark Herwick,
320 West Temple Street
Los Angeles, California 90012

Comments on Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan

Dear Mr. Herwick:

The Wildlife Corridor Conservation Authority (WCCA) has reviewed the Notice of Preparation (NOP) and Initial Study (IS) for Comprehensive Update and Amendment to the Los Angeles County General Plan (Project No. 02-305). In letters dated April 30, 2001 and May 2, 2001 (enclosed), WCCA commented on the November 2000 Los Angeles County Significant Ecological Areas Update Study (PCR Services Corporation, *et al.* 2000a, 2000b, 2000c), "SEA Update Study." WCCA requests you consider incorporating into the General Plan WCCA's comments provided in these previous letters.

As stated in these previous letters, WCCA commends the County and its consultants on the excellent work done for the update of the Significant Ecological Areas (SEAs). Specifically WCCA complements the County's and consultants' efforts to propose more inclusive and biologically sound boundaries to ensure sustainability of the SEAs. This is evident in the proposed Puente Hills SEA as shown on Figure 4 of the NOP/IS, Existing and Proposed Significant Ecological Areas.

The scale of Figure 4 does not enable us to definitively determine whether all of WCCA's recommendations for inclusion in the Puente Hills SEA have been incorporated. It does appear that some areas that WCCA recommended for inclusion into the Puente Hills SEA were not included, according to Figure 4 of this NOP/IS. Specifically, WCCA recommends that two areas located east of Harbor Boulevard be included in the Puente Hills SEA (see Areas 5 and 6 described in WCCA's April 30, 2001 letter). We look forward to reviewing more detailed maps of the Puente Hills SEA in the Environmental Impact Report for the General Plan Update and Amendment. Area 5 forms an entrance to a small canyon which is a critical wildlife link and the area is core habitat of the western Puente Hills. Area 6 is a buffer for a canyon

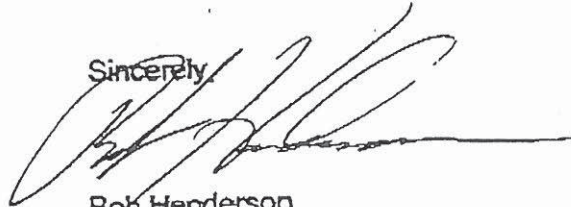
Mark Herwick
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which forms a critical wildlife link south of Shea Homes, across Harbor Boulevard. Area 6 may also support the coastal California gnatcatcher, listed as threatened by the U.S. Fish and Wildlife Service.

WCCA also strongly supports the general recommendations for implementation and land use practices for SEAs, as well as the specific recommendations for management practices for the proposed Puente Hills SEA in the SEA Update study, with modifications based on WCCA's May 2, 2001 letter on the SEA Update Study.

Thank you for the opportunity to comment. Please contact Judi Tamasi of our staff at (310) 589-3230 ext. 121 if you have any questions.

Sincerely,



Bob Henderson
Chair

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000a. *Biological Resources Assessment of the Proposed Puente Hills Significant Ecological Area*. Prepared for: Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. *Executive Summary of the Proposed Los Angeles County Significant Ecological Areas*. Prepared for: Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000c. *Los Angeles County Significant Ecological Areas Update Study 2000 Background Report*. Prepared for: Los Angeles County Department of Regional Planning. November.

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May 2, 2001

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George Malone, Section Head
Los Angeles County
Department of Regional Planning
General Plan Development Section
320 West Temple Street, 13th Floor
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Supplemental Comments on Los Angeles County Significant Ecological Areas Update Study

Dear Mr. Malone:

The Wildlife Corridor Conservation Authority (WCCA) offers the following comments on the Significant Ecological Areas Update Study documents prepared by the consultant team for the County of Los Angeles (County) (PCR Services Corporation *et al.* 2000a, 2000b, 2000c). This letter supplements our comments regarding the boundaries of the Puente Hills Significant Ecological Area (SEA) submitted in our April 30, 2001 letter. To reiterate from our previous letter, we commend the County and their consultants on the excellent work done for the SEA Update Study, including the consultants' efforts to propose more inclusive and biologically sound boundaries. We provide the following additional comments pertaining to the County's procedures for identifying and protecting SEAs within the County.

Identification and Management of Core Areas Within SEAs

Whether before or after the County adopts new SEA boundaries, WCCA recommends that SEAs be further evaluated to identify core areas that are absolutely essential for protecting critical plant and animal resources. In addition, corridors between core habitats must also be identified. The width of these movement areas must be based on actual monitoring of wildlife movement and on the biological needs of the target species they are intended to support. At the very least, these movement areas should be at least 600 feet wide. Critical riparian areas should include buffers at least 300 feet wide on each side from the stream edge of California Department of Fish and Game streambed jurisdiction. WCCA is pleased to assist in establishment of core areas for the Puente Hills SEA.

Future developments should not be permitted within core SEAs, because of the extreme importance of these areas to species using them. If the County chooses not to define core habitat zones, then future development should not be permitted in any area of the SEA unless certain conditions are met. Development should only be allowed in the SEA if the potential developer has fully mapped the biological resources and wildlife movement corridors within and adjacent to the proposed area of development and it has been demonstrated that the sensitive biological resources and wildlife movement corridors will be protected.

Management Within SEAs

WCCA concurs with limiting development to no more than 20 percent of the SEA, as proposed in the Background Report (PCR Services Corporation *et al.* 2000c; p. 29). (The SEA boundaries should be defined by those boundaries proposed in the Update Study documents and expanded based on comments received during the public review process). This 20 percent should include existing developed parcels, and should include fuel modification zones required for developments.

We strongly support the general recommendations for implementation and land use management practices, beginning on page 26 of the background report, and the specific recommendations for the proposed Puente Hills SEA on page ES-76 of the Executive Summary (PCR Services Corporation *et al.* 2000b, 2000c), with the modifications proposed in this letter. Reservoirs should be identified as an incompatible use with respect to SEA resources and should be excluded from SEAs.

Mitigation developments approved in SEAs or other sensitive areas should include setting aside or purchasing lands within the SEAs, prioritizing those lands within the core SEA areas.

SEATAC's Role in Protection of SEAs

We recommend greater involvement by the Significant Ecological Areas Technical Advisory Committee (SEATAC) in zoning matters that affect SEAs. More specifically, SEATAC recommendations need to be highlighted in County staff reports. In addition, SEATAC recommendations must hold more weight in the Environmental Impact Report alternatives process.

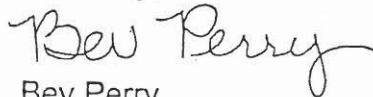
Application of Criteria to SEAs

In reviewing the consultant's recommendations, WCCA believes that criterion 1, pertaining to habitat of "core populations," has been applied inappropriately. The Puente-Chino Hills supports breeding populations of federally listed species such as the coastal California

gnatcatcher (*Poliophtila californica californica*) near the northwest edge of its range (Cooper 2000) and in the background report, a core population is defined as "a known and/or a viable population" (PCR Services Corporation *et al.* 2000c; p. 11). However, in the SEA Update Study, it was concluded that this criterion was not met. We believe that, given the rate of extinctions occurring among the indigenous species of southern California, no area containing breeding populations of such species should be excluded from the SEA program.

Thank you for allowing us to submit these supplemental comments after the identified deadline in order to accommodate the schedule of our Governing Board. WCCA welcomes the opportunity to work with the County in our mutual efforts to preserve the Puente Hills SEA. Please direct any questions and correspondence to Judi Tamasi of our staff at (310) 589-3200 ext. 121.

Sincerely,



Bev Perry
Chairperson

Literature cited

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

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000a. *Biological Resources Assessment of the Proposed Puente Hills Significant Ecological Area*. Prepared for: Los Angeles County Department of Regional Planning November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. *Executive Summary of the Proposed Los Angeles County Significant Ecological Areas*. Prepared for: Los Angeles County Department of Regional Planning. November.

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