



## **Puente Hills Habitat Preservation Authority**

Endowment Provided by the Puente Hills Landfill

January 26, 2012

Jacob Lieb  
Southern California Association of Governments  
818 West Seventh Street, 12th Floor  
Los Angeles, CA 90017-3435

Re: Draft Program Environmental Impact Report for the 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy

Dear Mr. Lieb:

The Puente Hills Habitat Preservation Authority (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. 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 appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 2012-2035 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). We have a few comments to offer on Section 3.3 of the document regarding Biological Resources and Open Space, as presented below.

On page 3.3-6 it notes that the California Department of Fish and Game considers three woodland plant communities as sensitive: valley oak woodland, Engelmann oak woodland, and California walnut woodland. However, any oak woodland may be considered protected under California State Statute Section 21083.4. In addition, on page 3.3-9, it notes that the California Natural Diversity Database (CNDDB) lists three sensitive coastal scrub communities: coastal bluff scrub, maritime succulent scrub, and Riversidian alluvial fan sage scrub. However, according to California Department of Fish and Game's Natural Communities List, Diegan and Venturan Coastal Sage Scrub are also considered sensitive plant communities. These plant communities are mentioned specifically since coast live oak woodlands and coastal sage scrub occur on the Puente Hills Preserve and we believe that impacts to these habitat types should be mitigated at a 3:1 ratio as required for sensitive plant communities in Mitigation Measure BIO/OS 11.

Comments Draft SCAG RTP and DEIR

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Mitigation Measure BIO/OS 35 on page 3.3-54 states that active bird nests can be “re-located” if found during pre-construction surveys. It is the Habitat Authority’s understanding that regulatory agencies do not issue permits for the relocation of active nests. Please consider revising the language to avoid any disturbance to active nests.

Mitigation Measures BIO/OS 36 and 45 discuss utilizing mitigation banking or off-site land conservation as ways to mitigate for impacts to habitat linkages/corridors and open space resources. The Habitat Authority regularly accepts off-site mitigation for projects and welcomes inclusion of the Puente Hills Preserve in SCAG’s forthcoming regional conservation planning policy, which will include such conservation opportunity areas. The Puente Hills Preserve is an integral part of the larger Puente-Chino Hills Wildlife Corridor, which provides many opportunities to further preserve and expand this corridor. On a related note, although it is unclear what constitutes a “large-scale protected area in the SCAG region” as listed in Appendix C, please consider adding the Puente Hills Preserve in Los Angeles County as managed by the Habitat Authority to that list.

Map 3.3-1 shows listed and sensitive species habitat within the SCAG region; however, the federally-listed coastal California gnatcatcher (*Polioptila californica californica*) is not shown as occurring in the Puente Hills Preserve. Occurrences of this species are documented in the CNDDDB, and the Habitat Authority is available to provide GIS shapefiles of gnatcatcher locations. In addition, Map 3.3-2 shows open space land uses in the SCAG region; however, the land use types shown for the Puente Hills Preserve are difficult to discern. In addition, it appears that some of the Preserve is designated as “open space” and some as “plant and animal habitat”, but no definitions of these land use types could be found in Section 3.3 of the DEIR. Please include a definition of each land use type and consider classifying the entire Preserve as one type, most likely “plant and animal habitat”.

The Habitat Authority is available to provide any information or data necessary during preparation of the Final EIR as well as the regional conservation planning policy. Please do not hesitate to contact me or Shannon Lucas, Ecologist, for discussion at (562) 945-9003.

Sincerely,



Bob Henderson  
Chairman

C: Board of Directors and Advisory Committee