

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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November 4, 2015

Ben Kim
Principal Planner
City of La Habra Heights
1245 North Hacienda Road
La Habra Heights, California 90631

Proposed Single-Family Home, Fullerton Road (PRJ 2013-104)

Dear Mr. Kim:

The Wildlife Corridor Conservation Authority (WCCA) was created to provide for the proper planning, conservation, environmental protection, and maintenance of the habitat and wildlife corridor between Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. It is one of our main goals to ensure that sufficient continuity of habitat can be preserved to maintain a functioning wildlife corridor within this area. A list of biological and other studies detailing the resources in, and value of, the wildlife corridor can be found at: <http://www.hosec.com/Bibliography>. In addition, a recent (2013) bobcat study that was being conducted for the Puente Hills Habitat Preservation Authority (Habitat Authority), provides detailed use of the Puente Hills by bobcats, including by Fullerton Road.^[1]

We are aware that a single family is being proposed on an approximately 5.7-acre parcel along Fullerton Road (Assessor Parcel Number 8267-013-006; PRJ 2013-104). The project site is located in the Puente-Chino Hills wildlife corridor. The project site is located across the street from parkland owned by the Habitat Authority. The access for the subject parcel shares access to the Habitat Authority trailhead and parking area.

It is our understanding the site plan(s) are draft and subject to change. We would appreciate if you would forward our comments to the applicant, so that they may consider our comments in any design/redesign of the project. We appreciate that you and the applicant are willing to hear our concerns at this early stage, prior to finalizing the design of the project.

^[1] August 12, 2013 letter to Andrea Gullo, Puente Hills Habitat Preservation Authority from Erin Boydston, United States Geological Survey, Western Ecological Research Center regarding summary of activities during the first year of the research project "Assessment of Human Impacts on Habitat and Connectivity for the Conservation of Bobcats and Other Wildlife in the Puente Hills"

Our main concerns with this project focus on maintaining the ecological functioning of the wildlife corridor particularly in this area and avoiding and minimizing impacts to public parkland. The California Environmental Quality Act (CEQA) document for this project should identify and avoid potentially significant adverse environmental impacts. Any remaining potentially significant adverse impacts should be minimized and mitigated. Given our concerns outlined in this letter, we recommend that a focused Environmental Impact Report (EIR) be considered, which fully considers alternative project designs and project features. That EIR could focus on a limited number of resource areas, including biological resources and land use.

Project Design

The project should be designed in a sensitive manner to avoid and minimize direct (e.g., construction of hardscape) and indirect (e.g., lighting) impacts to the wildlife corridor, biological resources and existing parkland. For example, a large house in the middle of the parcel with numerous other accessory elements (second house, tennis court, etc.) spread out over the parcel would not be compatible with the project site's location in the wildlife corridor. A poorly-sited house could result in unavoidable significant adverse environmental impacts. Potential and existing wildlife movement areas onsite should be identified by analyzing topography on and adjacent to the site as well as habitat connections to adjacent open space. The adjacent open space should be identified as privately or publicly owned (e.g., private/undeveloped, private open space with open space easement, Habitat Authority-owned, Los Angeles County-owned, etc.), in order to analyze the potential for the long-term viability of a wildlife movement area through the project site. A substantial amount of open space should be left onsite undisturbed that is appropriate for wildlife movement (moderate topography, connected to other protected open space containing moderate topography, buffered from development, etc.). The main house and associated structures and hardscape should be clustered outside of this identified preferred onsite open space/wildlife movement area.

The area of fuel modification should be minimized. The fuel modification for any buildings should overlap to the maximum extent (i.e., cluster buildings together). The project design should also ensure that no fuel modification is required on adjacent parkland.

Consideration should also be given to siting the project to avoid or minimize visual impacts from public viewing areas (e.g., trails, trailheads).

Fencing

There should be no perimeter fencing for the property. Any fencing should be limited to the edge of the immediate hardscape development footprint of structures or Zone A of the fuel modification zone (no fencing along roads or driveways). We are particularly

concerned that any new fencing along Fullerton Road, could trap and increase roadkill of wildlife (e.g., bobcats) attempting to cross. Even fencing with gaps or openings for wildlife is troublesome, given the challenges wildlife will face in finding the gaps while being trapped along Fullerton Road.^[2]

Lighting

Extensive lighting around developments can deter wildlife from moving at nighttime and can lead to a host of other adverse impacts to wildlife. We recommend that outdoor lighting be minimized. Outdoor lighting should be minimized, restricted to low-intensity features, shielded, concealed to the maximum feasible extent, directed downward, and directed toward the targeted area(s) only. Outdoor lighting should avoid light trespass onto non-target areas and use best available dark skies technology. Lighting for the following uses should be avoided: sports courts, driveways and access roads, and perimeter of property for aesthetic purposes. A lighting plan outlining the measures to minimize night lighting should be developed and included in the permit application to the City. See Attachment 1 for other suggested measures to minimize the adverse effects from night lighting.^[3]

Other Potential Impacts

Because of the concern for invasive landscaped plants invading adjacent open space land, we recommend that any landscaping plan exclude any invasive plants.

Need for Conservation Easement

Given the location of the project site within the wildlife corridor, the project must include a conservation easement over the remaining undeveloped open space on the project site. This would help ensure the continued value of the site for wildlife movement in perpetuity. Any conservation easement should be offered to a conservation or park agency with a focus on preservation of natural open space. Without such conservation easement, there remains the potential for significant adverse impacts to biological resources.

^[2] One example of specifications for wildlife-permeable fencing can be found in the Los Angeles County Santa Monica Mountains (SMMtns.) Local Coastal Program (LCP) Local Implementation Program (LIP) Section 22.44.630 (Definitions).

http://planning.lacounty.gov/assets/upl/project/coastal_adopted-LIP.pdf

^[3] See Los Angeles County SMMtns. LCP LIP Section 22.44.1270 for measures to minimize night lighting.

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Need for Consistency With General Plan

The project should be designed consistent with the requirements and intent of the environmental resource goals and policies in the General Plan. Any CEQA document should address consistency with the City's environmental resource goals and policies (See Attachment 2). For example, Goal 5 states:

Protect, preserve, and encourage open space within the City to ensure the maintenance of wildlife habitats, wildlife corridors, natural drainage courses, and passive recreational resources.

Environmental Resource Management Element Policy 38 states: "Encourage the protection of existing wildlife in the PCHWC [Puente-Chino Hills Wildlife Corridor]."

Need for Adequate California Environmental Quality Act Document

As you can see, we have several concerns regarding potentially significant adverse environmental impacts, particularly to the wildlife corridor. We recommend that an EIR be prepared for the project. This EIR could focus on the most germane environmental resources, including biological resources and land use. The CEQA document should address the biological significance of the Puente-Chino wildlife corridor and the project site's role in that corridor. Existing and potential wildlife movement on the site should be identified. The CEQA document should include an aerial photograph and topography map, showing the known or likely movement areas on and adjacent to the site based on topography, presence of open space, and land ownerships. Impacts to wildlife movement should be avoided and where not possible, minimized and mitigated. Alternatives should be analyzed that avoid any potentially significant adverse environmental impacts.

The CEQA document should also address the cumulative effects of this project in conjunction with other reasonably foreseeable projects, including the Aera residential development.

We hope these comments are helpful to the City and applicant. Again, we appreciate your consideration. Please add our agency to your mailing/email list for this project. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at judi.tamasi@mrca.ca.gov.

Sincerely,

Glenn Parker
Chairperson

Attachment 1

Some Recommendations to Minimize Night Lighting

(See Los Angeles County SMMtns. LCP LIP Section 22.44.1270 for these and other measures to minimize night lighting)

- Outdoor lighting should be minimized, restricted to low-intensity features, shielded, concealed to the maximum feasible extent, directed downward, and directed toward the targeted area(s) only. Outdoor lighting should avoid light trespass onto non-target areas and use best available dark skies technology.
- The following types of lighting should be prohibited: sports courts, driveways, and perimeter of property for aesthetic purposes.
- Security lighting attached to the principally permitted structure and other permitted accessory structures that is controlled by motion detectors could be permitted provided that they have a manufacturer's maximum output rating of no greater than 60 watts (600 lumens), or the equivalent.
- The minimum lighting necessary shall be used to light walkways used for entry and exit to permitted structures, including parking areas, on the site. This lighting shall be limited to fixtures that do not exceed two feet in height, that are directed downward, and have a manufacturer's maximum output rating of no greater than 60 watts (600 lumens), or the equivalent.
- Outdoor light fixtures shall be the minimum height necessary to achieve the identified lighting design objective. The maximum height for an outdoor light fixture (whether attached to a structure or detached), as measured from the finished grade to the top of the fixture should be twenty feet.

Attachment 2
Selected Excerpts from
La Habra Heights General Plan
(not a complete list)

Goal 5 Protect, preserve, and encourage open space within the City to ensure the maintenance of wildlife habitats, wildlife corridors, natural drainage courses, and passive recreational resources.

Environmental Resource Management Element (ERME) Policy 11. Protect existing wildlife habitats through the preservation of open space.

ERME Policy 12. Future development should have minimal adverse impacts on the environment and natural topography, and should not affect natural surroundings, including ridgelines, more than necessary to allow an economically viable use of privately held land.

ERME Policy 13. Participate with the County of Los Angeles, the Southern California Association of Governments, and other responsible agencies on all open space planning matters to the extent necessary to implement the City's General Plan policies regarding open space, development, and wildlife preservation within its planning area.

ERME Policy 15. The City shall encourage the dedication of open space land for public use and/or conservation purposes whenever possible.

ERME Policy 33. Regulate bright outside lighting and, to the extent consistent with the necessities of public safety, prohibit streetlights to preserve dark skies at night.

ERME Policy 35. Work with corridor landowners and government agencies in promoting land use plans within the corridor that are sensitive to the environment and give maximum consideration to the preservation of natural habitats.

ERME Policy 36. Work with corridor landowners and government agencies in identifying areas within the PCHWC [Puente-Chino Hills Wildlife Corridor] that should be preserved as open space for passive recreation, resource management, or public safety.

ERME Policy 38. Encourage the protection of existing wildlife in the PCHWC.