

The General Plan Amendment would also amend the Parks and Recreation Element and the Open Space Element, changing the Parks and Recreation plan map and the Open Space map designation of three sites for neighborhood and community parks and playgrounds within the Specific Plan area to reflect the proposed land use plan for Montebello Hills. The Montebello Hills Specific Plan provides a site to be offered for dedication to the City for development of a public park, a publicly accessible trail system, and the development of private parks and a private recreation facility to meet the recreational needs of residents.

Zoning

The Montebello Municipal Code (MMC) designates the project site as R-A-O (Residential Agricultural, Oil and Gas Production District overlay). It should be noted that this zoning, site conditions and current state, federal and local laws/regulations would limit development of the site below the General Plan density. These conditions or laws/regulations are specific to the topography, current habitat, units per lot (R-A/R1=1 unit per lot) and lot size.

The Applicant proposes to amend the current zoning designation from R-A-O to SP-O (Specific Plan, Oil and Gas Production District overlay) in accordance with the MMC Section 17.38.010. The Oil and Gas Production District overlay is not proposed to be amended and would remain in place to allow oil and gas operations to continue.

1.1.3 PROJECT OBJECTIVES

The Montebello Hills Specific Plan has the following objectives that have been refined from the work of the Citizens Advisory Committee (CAC) from 1992 to 1994 and Montebello Hills outreach process. In addition, the City's General Plan, Redevelopment Plan, the proposed Montebello Hills Specific Plan, and the existing physical, environmental, demographic and market conditions were considered:

- Implement the City's General Plan Housing Element objectives by providing residential units on a site identified in the General Plan for significant housing opportunities.
- Implement the City's General Plan Land Use Element objective that development of hill areas be designed to accommodate a variety of housing types (e.g., single family, townhouse-condominiums).
- Implement the City's General Plan Land Use Element policy that residential neighborhoods should be quiet, safe, and pleasant places to live. To accomplish this objective, the residential neighborhoods should be free from through traffic movements, encroachment of incompatible land uses through street design, and land uses compatible with adjacent residential land uses.
- Implement the redevelopment plan adopted for the site by the City of Montebello Redevelopment Agency by providing residential land uses and tax increment revenues to the Redevelopment Agency.
- Implement the SCAG goal to address regional housing needs through development of infill sites to house the forecast population, and give employees the opportunity to live closer to work.
- Enhance the jobs/housing balance in the region by providing additional housing in close proximity to a job-rich region.

- Create a development master plan that provides flexibility to adopt residential unit types in response to fluctuating market conditions.
- Provide a project design that incorporates the habitat and species recommendations of the local, state, and federal resource agencies, through creation, enhancement and permanent protection of habitat.
- Implement a development plan that provides for continued oil extraction activities and a continued revenue stream to the City from those activities.
- Support City and regional goals by providing timely, fully funded, project related infrastructure and facilities, including new public facilities.
- Provide a design for the residential area that implements sensitive grading practices to maximize preservation of visual resources.
- Provide trails and view opportunities for the community, at no cost to the City, on a site that is presently private and not open to the public.
- Provide a park to assist the City in meeting its parkland goals.
- Minimize conflicts with surrounding land uses through open space, community design and site development standards.

1.1.4 MONTEBELLO HILLS SPECIFIC PLAN

The project addressed in this DEIR is the construction and implementation of the proposed “Montebello Hills Specific Plan” and associated entitlements, permits, and agreements. The project information contained in this DEIR is based on the Development Applications on file with the City, the Draft Montebello Hills Specific Plan, various technical studies prepared by the Applicant (and independently reviewed by the City) and City’s consultant team, and related references.

1.1.4.1 Land Use Plan

The Specific Plan envisions a development area of approximately 173.6 gross acres comprised of five Planning Areas (see discussion below) that are integrated through complementary land uses (e.g., parks, trails and roadway network) and which are easily accessible to adjacent commercial areas, thereby reducing resident dependence on the automobile.

The Specific Plan provides for a variety of architectural styles and dwelling unit types (attached and detached) within the proposed Planning Areas.

Architectural Styles

A variety of revival architectural styles are proposed for the dwelling unit types planned for the Specific Plan. These styles are in keeping with the architectural traditions of the City of Montebello and Southern California in general. The proposed styles include:

- Mission
- Spanish Colonial

- Monterey
- Craftsman
- Farmhouse
- Ranch

Dwelling Unit Types

Proposed dwelling types include both attached and detached product types.

- Detached Residential Dwellings - These dwelling units generally consist of free-standing single-family residential buildings generally built on lots larger than the building and containing yards or common areas.

A number of lot designs are proposed within the Planning Areas and include:

- Conventional Front Loaded Detached Dwellings
 - Rear Loaded Detached Dwellings
 - Z Lots or 2-Pack and 3-Pack Detached Dwellings
 - Courtyard Cluster Detached Dwellings
 - Greencourt Cluster Detached Dwellings
- Attached Residential Dwelling - These dwelling units generally consist of attached residential buildings (e.g., condominiums, etc.) generally built on lots larger than the building and containing yards or common areas. These residences generally include:
 - Duplexes
 - Triplexes
 - Town homes (front and rear loaded)
 - Stacked Flat Condominiums

Representative examples of architectural styles, dwelling unit types and lot designs are contained within Sections 4, 6, and 8, respectively of the Specific Plan.

The Specific Plan provides for the possibility that some or all of the neighborhoods within the community may be gated. Even if the residential areas are gated, the publicly accessible trails and promenade and the public park will be open and accessible to the general population.

Transfer of Units within Planning Areas

The Specific Plan allows for the transfer of residential units to a different planning area, provided that specified criteria are met, including that the total number of units within any residential planning area will not be increased by more than 20% above the total established for that planning area, and that the total number of units in the Specific Plan does not exceed 1,200 units.

Open Space and Reserve

The project has been designed to minimize or avoid certain environmental impacts. For example, the footprint of the proposed development area, the design of the Open Space and Montebello Hills Reserve (Reserve) area are based on consultation with the United States Fish and Wildlife Service (USFWS).

Those design and implementation elements that are part of the project are called project design features and they are described in various topics in this DEIR.

As described in more detail in the Biological Resources Assessment (Appendix F of this DEIR), project planning began by identifying the conservation demands on the project site prior to determining grading limits, the grading plan or the unit count. Once the footprint was defined in a collaborative process with the USFWS, a phased revegetation/grading schedule was designed to maintain a specified quantity and quality of coastal sage scrub plant community on the project site throughout the grading process.

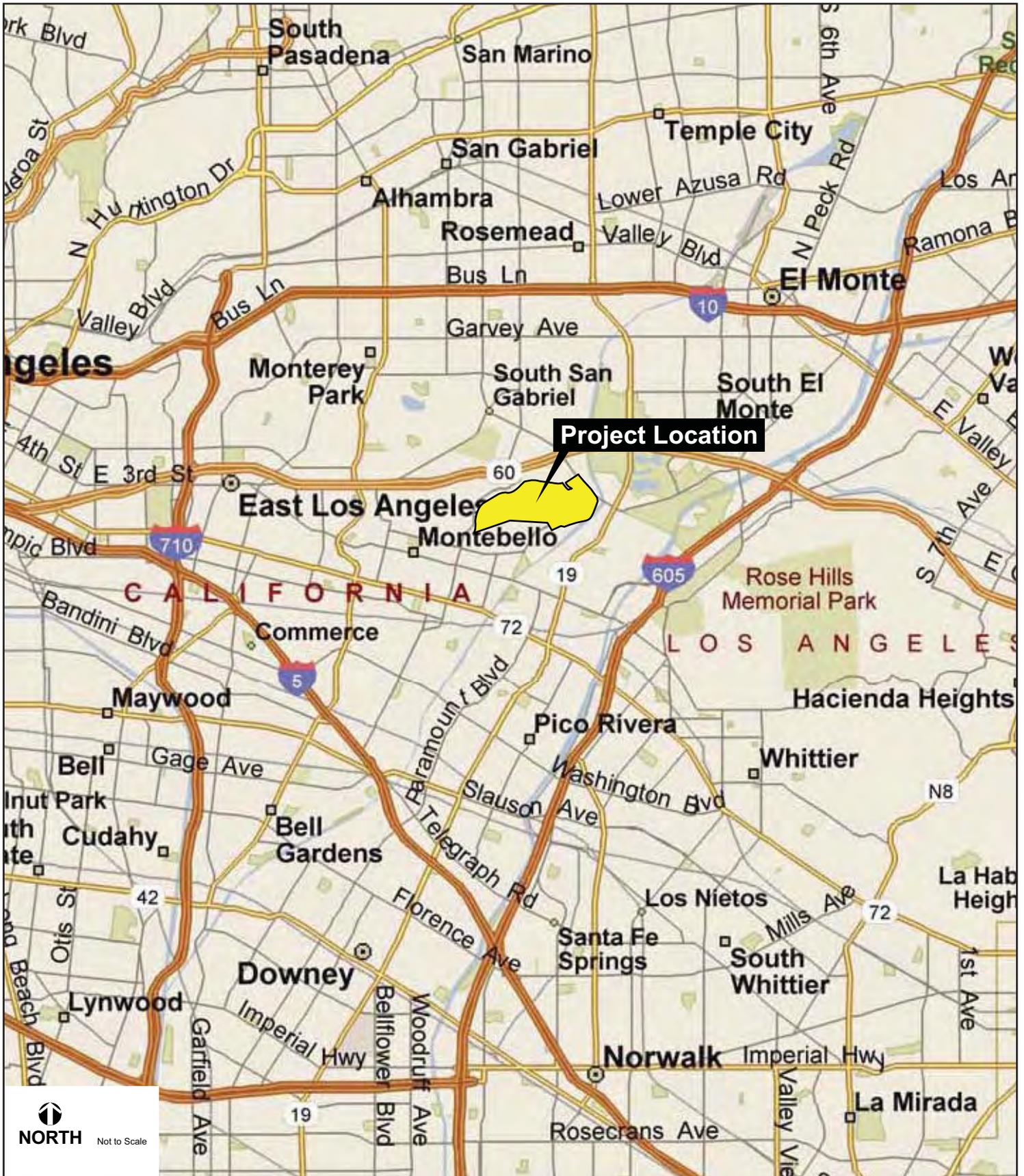
The biological project design features that will be implemented as part of the proposed project are listed in detail in Section 4.4 (Biological Resources) of this DEIR. The following summarizes the key design features relative to the Open Space and Reserve.

- Loss of habitat will be offset through a combination of revegetation, creation and enhancement of coastal sage scrub habitat and preservation and management of the 260.6 acre Reserve, which will contain 244.9 acres of coastal sage scrub.³ The revegetation, creation and enhancement will increase the amount of coastal sage scrub on the site by 55.1 acres. These activities will also enhance coastal sage scrub quality on site by increasing the percent cover of coastal sage scrub species and reducing non-native species.
- Fencing will be located where residential lots abut the Reserve and no direct access to the Reserve through the fences will be provided to homeowners or their pets. Recreational trail use will be allowed during daylight hours only.
- Lighting adjacent to the Reserve will be limited to the minimum required for public safety and will be low intensity bollard lighting directed and shielded to prevent artificial lighting from reflecting into the Reserve.
- Grading of each Phase will only proceed after specified performance criteria are met for coastal sage scrub created, enhanced or revegetated.
- Construction monitoring and biological surveys to monitor the California gnatcatcher population will be conducted in accordance with specified conservation measures approved by the Service.
- The Montebello Hills Habitat Reserve will be monitored and managed in perpetuity and the Applicant will establish a non-wasting endowment fund for this purpose. A conservation easement will be placed over the Reserve.
- Impacts to wetland areas will be offset through the restoration and creation of similar habitat.

Sustainability Features

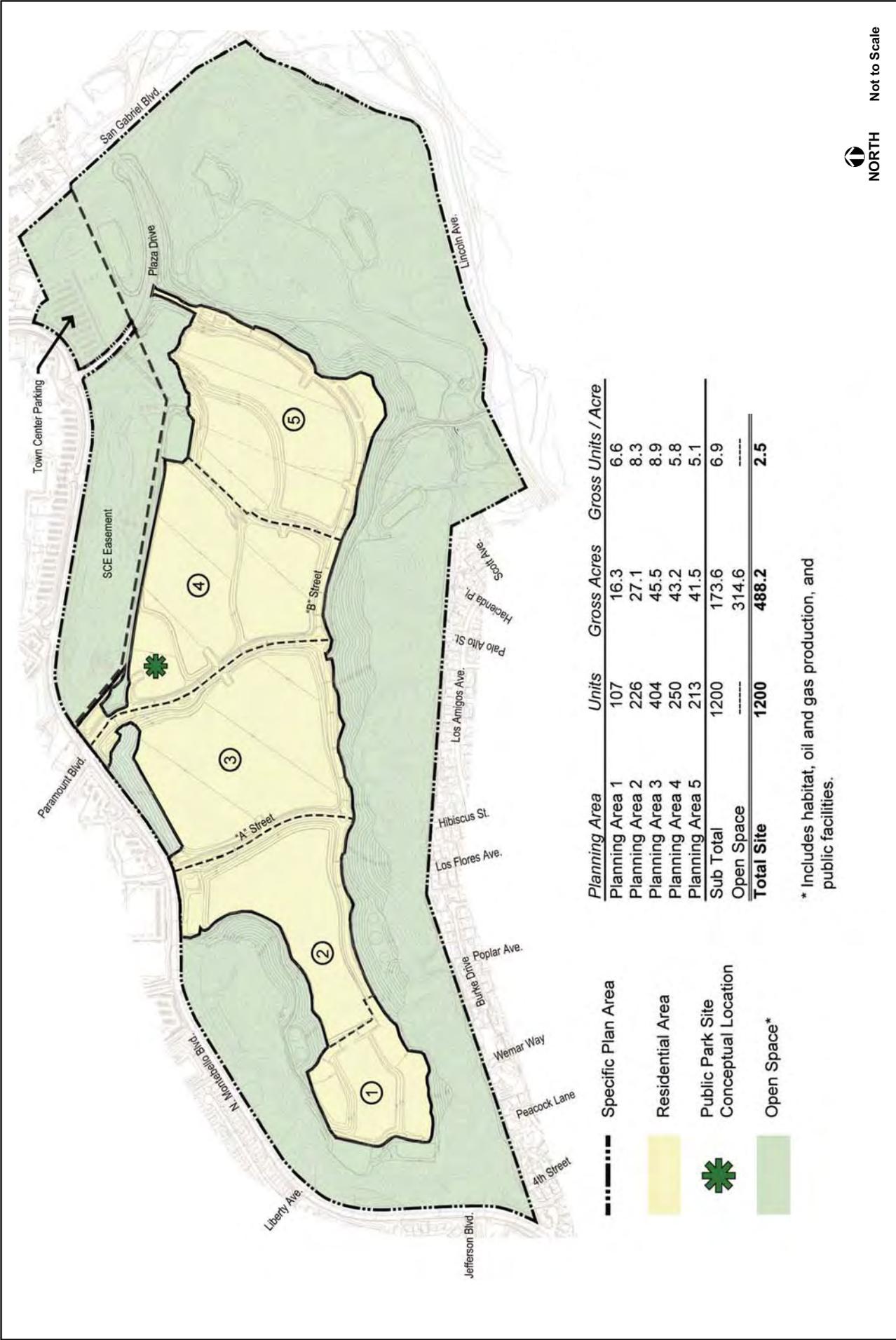
A number of sustainable design features would be incorporated into the proposed project, with the intention of conserving energy and reducing any wasteful use of resources. In general, the proposed project is considered an urban “infill” development due to its surrounding urban environment and ability to utilize existing infrastructure in the area (i.e., transportation infrastructure, retail and personal services, etc.), which would reduce vehicle trips and their associated emissions. In addition, “green building”

³ The eventual Reserve will also include 2.3 acres of coastal sage scrub revegetated on manufactured slopes of the Southern Edge Drainage Improvement Project for a total of 247.3 acres of coastal sage scrub within the 260.6 acre Reserve. It should be noted that when oil operations cease, at some point in the future, 14.1 acres of oil pads and roads will be restored to coastal sage scrub.



Source: Cook Hill Properties, LLC and P&D Consultants (2008).

**Figure 3-1
Regional Map**



NORTH Not to Scale

**Figure 3-5
Planning Areas**

Planning Area	Units	Gross Acres	Gross Units / Acre
Planning Area 1	107	16.3	6.6
Planning Area 2	226	27.1	8.3
Planning Area 3	404	45.5	8.9
Planning Area 4	250	43.2	5.8
Planning Area 5	213	41.5	5.1
Sub Total	1200	173.6	6.9
Open Space	-----	314.6	-----
Total Site	1200	488.2	2.5

* Includes habitat, oil and gas production, and public facilities.

-  Specific Plan Area
-  Residential Area
-  Public Park Site Conceptual Location
-  Open Space*

Source: Cook Hill Properties, LLC and P&D Consultants (2008).

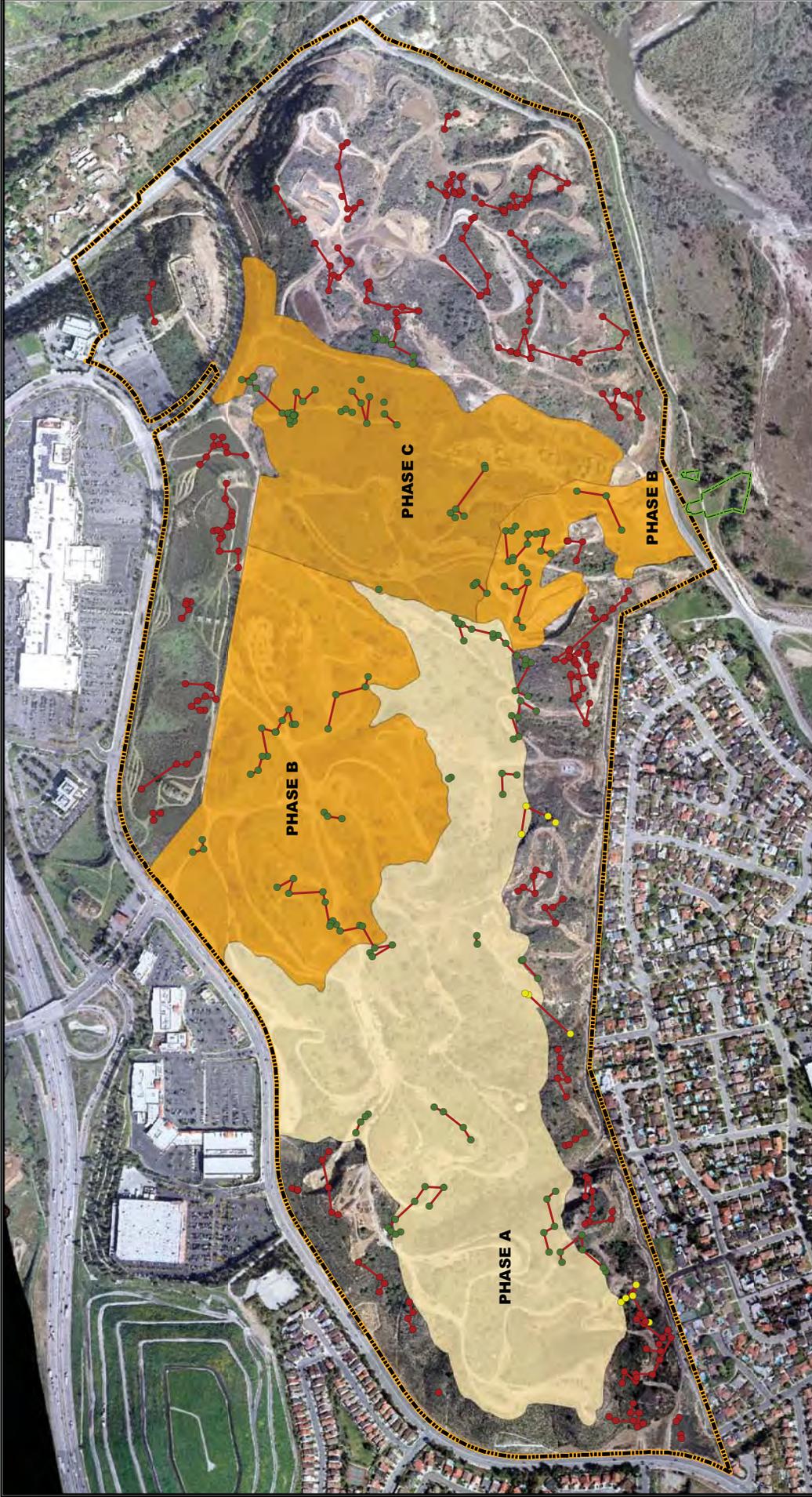


- Coastal Sage Scrub
- Created Coastal Sage Scrub - 2008
- Created Coastal Sage Scrub 2007
- Enhanced Coastal Sage Scrub
- Disturbed Coastal Sage Scrub
- Mulefat Scrub
- Disturbed Mulefat Scrub
- Oak Woodland
- Southern Willow Scrub
- Non-Native Trees
- Ruderal
- City Right-of-Way Vegetation
- Disturbed

 NORTH Not to Scale

Source: NRC and P&D Consultants (2008); Aerial Imagery 0.5-foot resolution (February 2008).

Figure 4.4-4
Plant Community Impacts



-  Specific Plan Boundary
-  Lines connecting points for known pairs
-  Off-site Basins
-  Status of Gnatcatcher Pairs
-  Gnatcatcher pair with use area not affected by grading
-  Gnatcatcher pair with part of use area affected by grading
-  Gnatcatcher pair with most of use area affected by grading

 NORTH Not to Scale

Source: NRC and P&D Consultants (2008); Aerial Imagery 0.5-foot resolution (February 2008).

Figure 4.4-5
Coastal California Gnatcatcher Territories (2007)



Puente Hills Landfill
Native Habitat Preservation Authority

April 23, 2009

Michael Huntley
Director of Planning and Community Development
City of Montebello
1600 W. Beverly Boulevard
Montebello, California 90640

Re: Comments on Draft Environmental Impact Report (DEIR): Montebello Hills Specific Plan

Dear Mr. Huntley:

The Puente Hills Landfill Native 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. 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 appreciates the opportunity to comment on the draft Environmental Impact Report (DEIR) for the Montebello Hills Specific Plan. Please include in its entirety our letter dated March 27, 2008 that was previously submitted and is now attached hereto as a part of the Habitat Authority's comments on the DEIR.

As stated in our previous comment letter on the Notice of Preparation for the project EIR (dated March 27, 2008), the Habitat Authority manages 3,869 acres of public open space just east of Whittier Narrows, directly across the San Gabriel River/Rio Hondo from the Montebello Hills. Together with these lands, the project site is part of a regional corridor, which form a critical buffer of remaining open space between the San Gabriel Valley and the coastal plain of Orange County. The Montebello Hills, together with the Whittier



Narrows Recreation Area, represent perhaps the most important ecological reserve left on the floor of the Los Angeles Basin. The combination of native habitats in close proximity (coastal sage scrub, chaparral, oak woodland, riparian, freshwater marsh), and the relatively large extent of these habitats makes this area an extremely high priority to local conservation and preservation groups, including the Habitat Authority.

The proposed project site is 488.2 acres in size. It proposes to build 1,200 dwelling units on 173.6 acres and leave 314.6 acres of open space – 260 acres of which will be a habitat Reserve.

The project, as proposed, will have enormous adverse impacts on coastal California gnatcatcher individuals and designated critical habitat for the species. The DEIR clearly acknowledges that the project may result in the loss of 30 pairs of gnatcatchers (12 in Phase A, 11 in Phase B, and 7 in Phase C) out of the 76 total pairs document on-site in 2008; this would result in a loss of 40% of the resident gnatcatcher pairs on-site! It is hard to rectify this fact with the statement in the DEIR that the project “would not result in substantial reduction of California gnatcatcher population size or viability.” The Biological Opinion issued by the U.S. Fish and Wildlife Service (Service) must be provided as an appendix to the DEIR to ensure full consistency of mitigation/conservation measures and a full disclosure of the impact analysis that lead to their determination that the project would not result in “jeopardy” to the species.

We consider a 40% loss of the species on-site as a significant adverse impact which needs to be avoided, minimized or mitigated, possibly in the form of translocation. Despite the acknowledgement in the DEIR that the “short-term” impact of the loss of 30 pairs of gnatcatchers will be significant, no mitigation is proposed for this impact. As mitigation, the Habitat Authority suggests coordinating with the Service to investigate the feasibility of translocating some or all of the displaced gnatcatcher pairs into suitable habitat on the Puente Hills Preserve, Whittier Narrows, or other nearby preserved habitat within designated critical habitat Unit 9. Translocation efforts for cactus wren have proven initially successful in Orange County¹ and may also be successful for gnatcatchers. In addition, habitats to which pairs are relocated should be enhanced and monitored, and preserved in perpetuity.

Even if translocation is determined to be infeasible by the Service, coastal sage scrub within critical habitat Unit 9 should be created and/or restored to mitigate for the net loss of critical habitat by the proposed development. Critical habitat is designated by the Service because such areas are considered essential to the conservation of the species. The entire project site is included in critical habitat Unit 9, including the development area and the Project’s Reserve; therefore, mere preservation of the habitat within the Project’s Reserve will still result in a net loss of critical habitat because the project will

¹ Kamada, D. and Mitrovitch, M.J. 2006. Results of the 2006 Cactus Wren (*Campylorhynchus brunneicapillus*) Translocation Study in Orange County, California. Prepared for: Department of Fish and Game, South Coast Region. December 2006.

remove 238 acres of critical habitat and will effectively truncate Unit 9. The loss of areas considered to be “essential” to the conservation of the species results in an overall loss of area available for the species to use for recovery, and is a significant impact that must be mitigated by the creation or enhancement of coastal sage scrub (CSS) habitat elsewhere in Unit 9, preferably in close proximity to the site such as in the Whittier Narrows or on Habitat Authority lands immediately east of the Narrows.

Such CSS habitat creation or enhancement in the Whittier Narrows or western Puente Hills would also help to mitigate for the loss of gnatcatcher pairs and the associated loss of genetic diversity within the population. By creating or enhancing CSS habitat within this “pinch point”, it would increase the potential for movement and dispersal between occupied gnatcatcher habitat within the Reserve on the project site and occupied habitat to the east on the Puente Hills Preserve, and strengthening the populations within critical habitat Unit 9 due to increased genetic exchange and diversity. Although the DEIR notes that the project site has minimal connectivity with other California gnatcatcher populations, gnatcatchers have been documented 10 times within the Whittier Narrows immediately east of the project site, and several resident pairs of gnatcatchers are present immediately east of the Narrows in the western Puente Hills Preserve. In fact, the Puente Hills Preserve is located only approximately two miles east of the project site, which is within the known dispersal range of gnatcatchers. A corridor or linkage of native vegetation providing foraging is essential to facilitate such dispersal, and the creation or enhancement of such habitat within the Whittier Narrows or western Puente Hills must occur to mitigate for the substantial losses to this core gnatcatcher population within critical habitat Unit 9.

CSS habitat creation and/or enhancement will also help to account for the general regional loss of CSS habitat, a sensitive plant community. Although creation and enhancement of this community has been conducted and is proposed on the project site, it appears that the final ratio of created/enhanced habitat to impacted habitat is less than the typical 2:1 ratio. The presentation of habitat impacts in both the text and tables is extremely confusing, but it appears that overall the project will result in a 1.7:1 ratio of created/enhanced CSS to removed CSS. However, this includes over 70 acres of CSS habitat that has already been created on-site and is part of the project’s “existing condition”; therefore, this habitat cannot be considered as mitigation for impacts to CSS from the proposed project. Given that, the resulting mitigation ratio is nearly 1:1, which is unacceptable as mitigation for the substantial loss of high-quality habitat on the project site which provides nesting habitat for a core population of the federally threatened coastal California gnatcatcher. *Additional CSS habitat must be created or enhanced off-site in addition to the habitat created/enhanced on-site in order to reduce this significant impact to less-than-significant.*

The Habitat Authority agrees with the Project Design Feature (PDF) 4.4-4 requiring a fence plan to protect the Reserve habitats and species. However, as recommended in our previous letter dated March 27, 2008, the fencing should be six feet high in all backyards that abut the open space to minimize human/wildlife interactions, and chicken wire should also be installed in the ground below the fences to prevent digging under the

fence. Also the Habitat Authority acknowledges the inclusion of educational materials for adjacent homeowners in Mitigation Measure BR-16; the Habitat Authority is available to provide appropriate language for such materials as requested. In addition, a copy of the long-term management plan required as part of Mitigation Measure BR-16 should be provided as an appendix to this DEIR to allow for complete analysis and disclosure of impacts to adequately determine whether the project will result in less-than-significant impacts to biological resources in the long-term.

Please refer to our previous letter dated March 27, 2008 regarding wildlife movement and mortality in this area. . The assertion in the DEIR that there is essentially no wildlife movement east from the project site must be substantiated with observational studies, not just assumptions based on the presence of roads and fences. A more thorough study of wildlife movement between the project site and open space habitats to the east is necessary in order to adequately determine the significance of impacts to the entire Puente-Chino Hills wildlife corridor, of which the project site is a part.

If this project is approved, the Habitat Authority urges that the environmentally preferred alternative, Alternative 4, be implemented instead of the proposed project. This alternative would involve the construction of 600 residential units within a smaller disturbance area of 130 acres, with a larger open space area of 358.2 acres. It would result in a smaller project footprint and, therefore, less significant impacts to sensitive biological resources as compared to the proposed project. This alternative is feasible and meets all but two of the project objectives. Per the CEQA guidelines, project alternatives need only to “feasibly attain most of the basic objectives of the project”; therefore, the fact that it does not meet all of the objectives does not make it infeasible and it should be implemented in place of the proposed project.

An additional alternative should be considered which would cluster the development area within the western portion of the site, as opposed to the center of the site as is currently proposed; this would allow for one large contiguous habitat Reserve within the eastern portion of the site and would facilitate maximum connectivity with the existing open space areas within the adjacent Whittier Narrows. Currently, the proposed open space areas and habitat Reserve are located as a narrow ring around the proposed development area, which results in habitat fragmentation and a much longer urban interface zone along both edges of the preserve, especially in the western portion of the proposed Reserve due to the existing development to the west and south. By clustering the development to the west and creating the Reserve in the eastern portion of the site, edge effects from the proposed and existing development would be reduced considerably and would reduce significant long-term impacts to the habitat and species within the Reserve, including the California gnatcatcher. This alternative should be considered to further reduce significant impacts to sensitive biological resources.

Per the CEQA guidelines, when using a “list” approach for identifying related projects for the cumulative impact analysis, “factors to consider when determining whether to include a related project should include the nature of each environmental resource being

examined, the location of the project and its type” and the lead agency should “define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.” Given this, the 1.5-mile area around the project site used to develop the related projects list appears to be inadequate for biological resources, and no explanation is provided as to why this 1.5-mile area was used. For impacts to sensitive biological resources, the cumulative impacts analysis should include at least all of critical habitat Unit 9 for the coastal California gnatcatcher, and the entire Puente-Chino Hills corridor for regional wildlife movement and sensitive biological resources in general, as the project site is a part of both of these. The cumulative impacts discussion says that the Puente-Chino Hills are not in proximity to the site; however, given the fact that the site is only approximately two miles west of the Puente Hills Preserve and given that the Whittier Narrows provides open space habitat in between, this statement is false. The cumulative impacts analysis must also include the Tehachapi Renewable Transmission Project, which will result in significant impacts to sensitive species and habitats throughout the region similar to those from the proposed project.

Thank you for your consideration, and please include me on the mailing list associated with the proceedings for this project. Please do not hesitate to contact me or Shannon Lucas, Ecologist, for discussion at (562) 945-9003 or slucas@habitatauthority.org.

Sincerely,



Bob Henderson
Chairman

C: Board of Directors and Advisory Committee

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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

TELEPHONE: (310) 589-3200

FAX: (310) 589-2408

GLENN PARKER
CHAIR
PUBLIC MEMBER
ORANGE COUNTY

July 21, 2008

JOHN BEAUMAN
VICE-CHAIR
CITY OF BREA

Gilberto Ruiz
City of Montebello
1600 W. Beverly Boulevard
Montebello, California 90640

BOB HENDERSON
CITY OF WHITTIER

Montebello Hills Specific Plan Notice of Preparation

HOWARD VIPPERMAN
CITY OF LA HABRA HEIGHTS

Dear Mr. Ruiz:

JACK TANAKA
CITY OF DIAMOND BAR

The Wildlife Corridor Conservation Authority (WCCA) was established to provide for the proper planning, conservation, environmental protection, and maintenance of lands within the Puente-Chino Hills wildlife corridor area. WCCA is concerned with this project because of the ecological value of the project site to the Puente-Chino Hills wildlife corridor. We are also interested in preserving any potential recreational connections from the project site to Whittier Narrows and throughout the wildlife corridor. We were not officially notified of the Notice of Preparation (NOP) and we request that the City consider the following comments during the preparation of the Draft Environmental Impact Report (DEIR). This letter was adopted at the June 11, 2008 WCCA Governing Board meeting.

GARY WATTS
CALIFORNIA STATE PARKS

MICHAEL HUGHES
PUBLIC MEMBER
LOS ANGELES COUNTY

ELIZABETH CHEADLE
SANTA MONICA MOUNTAINS
CONSERVANCY

DICKIE SIMMONS
LOS ANGELES COUNTY
BOARD OF SUPERVISORS

WCCA concurs with the comments submitted by the Puente Hills Landfill Native Habitat Preservation Authority in their March 27, 2008 letter. Those comments are incorporated into this letter by reference.

The DEIR should include a figure showing the extent of critical habitat for the coastal California gnatcatcher, as designated on the site by the United States Fish and Wildlife Service. The DEIR should quantify anticipated impacts to gnatcatcher critical habitat. The DEIR should include avoidance measures and mitigation measures for any unavoidable impacts to critical habitat. The DEIR should also address the project's consistency with Assembly Bill No. 32, California Global Warming Solutions Act of 2006.

Thank you for your consideration of these comments. Please include our agency on any mail/email lists for this project, as we would like to receive the Draft Environmental Impact Report and any other public notices for this project.

Mr. Gilberto Ruiz
Montebello Hills Specific Plan NOP
July 21, 2008
Page 2

If you have any questions, Judi Tamasi of our staff can be reached by phone at (310) 589-3200, ext. 121 or by email at judi.tamasi@mrca.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Edelman", written in a cursive style.

Paul Edelman
Chief of Natural Resources and Planning



Puente Hills Landfill
Native Habitat Preservation Authority

March 27, 2008

Gilberto Ruiz
City of Montebello
1600 W. Beverly Blvd.
Montebello, CA 90640

**Notice of Preparation for Draft Environmental Impact Report (DEIR)
Montebello Hills Specific Plan project (Cook Hills Properties)**

Dear Mr. Ruiz:

The Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the Notice of Preparation (NOP) for the Montebello Hills Specific Plan project. The Habitat Authority was inadvertently omitted from the NOP distribution list. A letter from this agency was sent earlier in the month requesting a time extension for submitting comments. Thank you for your consideration of the following comments.

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. The mission of the Habitat Authority is to acquire, restore, and manage 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 requests that the DEIR consider impacts to lands this agency owns and/or manages. Overall, the Habitat Authority manages 3,860 acres of public open space just east of Whittier Narrows, directly across the San Gabriel River/ Rio Hondo from the Montebello Hills. Land managed by this agency is for biological preservation purposes. Together, these open space areas form a critical buffer of open space between the San Gabriel Valley and the coastal plain of Orange County, both of which have been converted to urban and residential land use. The Montebello Hills, together with the Whittier Narrows Recreation Area, represent perhaps the most important ecological reserve left on the floor of the Los Angeles Basin. The combination of habitats in close



proximity (coastal sage scrub, chaparral, oak woodland, riparian, freshwater marsh), and the relatively large extent of these habitats makes this area an extremely high priority to local conservation and preservation groups, including the Habitat Authority.

Because many of the sensitive species of the Montebello Hills area are mobile (including birds such as the California Gnatcatcher), we consider these three areas ecologically linked, such that any impact to one may in turn impact the others. For this reason, we are greatly concerned about proposed development of a large portion of the Montebello Hills open space, and the resulting permanent loss of wildlife habitat.

The DEIR needs to include analysis regarding impacts to the federally-threatened California gnatcatcher. This species is now reduced in Los Angeles County to a few scattered pockets in the southern and eastern portion of the county. Estimates by the United States Fish and Wildlife Service have put the total number of gnatcatchers in the Montebello Hills at 30-50 pairs, making this arguably the most important "core" population for this species in the Los Angeles Basin; for this reason, it was included in its most recent designation of Critical Habitat. By contrast, the population in the western Puente Hills is fewer than 5 pairs, with scattered pairs along the southern flank of the eastern Puente and western Chino Hills now largely extirpated (since 1998) and seriously threatened by surrounding land uses. In addition, this bird has been spotted in and around the Montebello Hills area, a possible indication of its mobility to larger habitat areas such as the Puente Hills. The DEIR needs to include study results from protocol surveys, and address how the project will avoid, minimize or mitigate for impacts to this bird population.

The DEIR needs address how the project will avoid, minimize or mitigate for impacts to other protected animal species known from the Montebello Hills including birds such as the Cactus Wren (taxonomy under review but coastal Calif. populations appear to be similar and distinct from interior birds, and therefore listed as a California Species of Special Concern) and the White-tailed Kite (listed as Calif. Fully-protected). The Cactus Wren is seriously imperiled in the Los Angeles, with scattered remnant populations in the eastern San Gabriel foothills, the San Jose Hills, the Whittier Hills and the Palos Verdes Peninsula. The population in the Baldwin Hills disappeared in the 1990s, and those along Big Tujunga Wash and the San Gabriel River Wash are tiny and may be nearing extirpation. The White-tailed Kite may no longer nest regularly in the Los Angeles Basin, but Whittier Narrows adjacent to the Montebello Hills was one of its final breeding areas.

The DEIR needs address how the project will avoid, minimize or mitigate for impacts to additional California Species of Special Concern possibly present (though un-surveyed). These include the Burrowing Owl, mammals like the San Diego black-tailed jackrabbit, American badger, San Diego desert woodrat, Coast horned lizard, California legless-lizard, rosy boa, San Bernardino ringneck snake, and coast patchnose snake. All of these species are scarce or extirpated from scrubland habitats on the floor of the Los Angeles Basin, but may be extant in the Montebello Hills. Jackrabbits were last seen in the

Whittier Narrows area in the early 1990s, and horned lizards were present through the 1970s.

The Montebello Hills provide important habitat for regionally-scarce wildlife species that are not on any protected list, but are nonetheless extremely rare now in the Los Angeles area, as a result of the transformation of basin habitats into urban uses. These include birds such as the Greater Roadrunner, reptiles like the coachwhip, amphibians like the garden slender-salamander, and others. The DEIR needs address how the project will avoid, minimize or mitigate for impacts to these species as well.

The DEIR needs address how the project will avoid, minimize or mitigate for impacts to plants including the coastal sage scrub community. The large expanse of coastal sage scrub, and the high level of endemism and rarity of coastal sage scrub species point to the need for immediate surveys at appropriate times of year (April – June) and after winters with decent rainfall (e.g., 2008).

The DEIR needs address how the project will avoid, minimize or mitigate for impacts to, the ecological connections between the Montebello Hills and the Rio Hondo/ Whittier Narrows. These connections are critical linkages that must be maintained, and should be enhanced. Currently, wildlife mortality along the few roads separating these areas (incl. Lincoln Ave.) is extremely high, and proposed development would likely drive more animals east toward the Narrows, and could even both “pull” certain scavenging species up from the river into the hills, resulting in further roadkills, and continuing the degradation of the ecological connections between the two areas.

Additionally The DEIR needs address how the project will avoid, minimize or mitigate for impacts to the Puente Chino Hills Wildlife Corridor which spans from the Whittier Narrows, through the Habitat Authority’s jurisdiction, through the Chino Hills State Park and connects with the Cleveland National Forest. The DEIR needs to provide analysis regarding cumulative impacts of the proposed increase in urbanization on the regional natural environment

The DEIR needs to address how the project will avoid, minimize or mitigate for urban edge impacts from residential development on the CA Gnatcatcher, especially potential impacts from house cats, as well as impacts to all wildlife. The Habitat Authority recommends that an educational flyer for residents about living with all types of wildlife be a part of the conditions for development. Consideration should be given to installing six foot high fences in all backyards that abut open space to minimize human/wildlife interactions. The ground below the fences would also need something such as chicken wire installed in order to keep native wildlife such as coyotes from digging under the fences. In addition to fencing, voluntary trails originating from the development should be prohibited to reduce further habitat fragmentation of the area.

The Habitat Authority found the NOP unusually brief, and therefore, problematic in presenting complete comments for items to be included in the DEIR.

The DEIR needs to include various alternatives including a no project alternative, and one with a reduced project footprint. The DEIR should include various design alternatives including one that maintains an adequate ecological reserve for the California gnatcatcher with clustered housing to enhance ecological connections between regional open space areas. This reserve should not be a part of the fuel modification zone for structures or roads.

Please add us to the mailing list for the DEIR when it is made available for public review. Thank you for your consideration of our comments. Feel free to contact Andrea Gullo, Executive Director, at (562) 945-9003 for further discussion.

Sincerely,



Bob Henderson
Chairman

Cc: Board of Directors, Habitat Authority
Citizens Technical Advisory Committee, Habitat Authority
Belinda Faustinos, RMC