



September 7, 2007

Daniel Fierros  
**LOS ANGELES COUNTY**  
**DEPARTMENT OF REGIONAL PLANNING**  
Impact Analysis Section  
West Temple Street  
Los Angeles CA 90012

**Re: RESPONSES TO COMMENTS FROM LEONA VALLEY TOWN COUNCIL  
REGARDING BIOLOGICAL RESOURCES WITHIN THE DRAFT INITIAL  
STUDY FOR THE 292.49-ACRE BOUQUET CANYON PROJECT SITE  
(TR0066952), UNINCORPORATED LOS ANGELES COUNTY, CALIFORNIA**

Dear Mr. Fierros:

This letter presents **PCR Services Corporation's (PCR's)** responses to comments regarding biological resources made by the Leona Valley Town Council (LVTC) in a letter dated August 6, 2007 regarding the 292.49-acre Bouquet Canyon Project Site (TR0066952) located in unincorporated Los Angeles County (County), California. In their letter, the LVTC commented on the County's draft Initial Study and recommended Mitigated Negative Declaration dated June 21, 2007. It is important to note that the following technical biological reports prepared by PCR, while submitted to your department as a part of the Initial Study Questionnaire, were not included as attachments to the Initial Study and were apparently not reviewed by the LVTC when they prepared their letter: 1) *Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California* (August 15, 2006) and 2) *Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles County, California* (August 2006). As a result, the responses contained herein may refer to sections of these technical reports which directly address the comments in detail and do not require further elaboration.

**Response to Comment: HAZARDS – 2. Flood, a. page 8.** The comments on this page regarding the need for protection by California Department of Fish and Game (CDFG) of Bouquet Canyon Creek or any sensitive species it may support are addressed within both technical reports prepared by PCR. In the *Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles County, California*, PCR has delineated waters subject to the jurisdiction of the CDFG. As stated on pages 22 through 24 of that technical document, the CDFG will review the proposed project as it affects streambed habitats within the project area. The CDFG may then place conditions on the Section 1602 clearance to avoid, minimize, and mitigate any potentially significant adverse impacts within the CDFG jurisdictional limits. We have made Valley Vineyards, LLC aware of these requirements and it is our understanding that Valley Vineyards, LLC intends to comply with those requirements. In addition, as mentioned in the *Results of a General Biological*



*Assessment and Sensitive Plant Surveys for the Approximately 290-acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California*, the site does not support suitable habitat for the California red-legged frog (*Rana aurora draytonii*) or any other aquatic sensitive species such as the unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*).

**Response to Comment: HAZARDS – 2. Flood, Conclusion, page 12.** The comment recommends coordination with the CDFG. As discussed in the previous response to comment, the CDFG will review the proposed project as it affects streambed habitats within the project area. The CDFG may then place conditions on the Section 1602 agreement to avoid, minimize, and mitigate any potentially significant adverse impacts within the CDFG jurisdictional limits. We have made Valley Vineyards, LLC aware of these requirements and it is our understanding that Valley Vineyards, LLC intends to comply with those requirements.

**Response to Comment: RESOURCES – 3. Biota, a. page 26.** The comment disagrees with the County’s findings that the project site is not within a Significant Ecological Area (SEA), SEA Buffer, or coastal Sensitive Environmental Resources [Environmentally Sensitive Habitat Area (ESHA), etc.], and it is not relatively undisturbed and natural. In response, SEAs are mapped as an overlay within the Los Angeles County General Plan. After reviewing the location and boundaries of the project site in relation to the County mapped SEAs, it was determined that the project site is not within, nor does it overlay, a mapped SEA.

**Response to Comment: RESOURCES – 3. Biota, b. page 27.** The comment states that natural habitat will be removed from the site and that growing grape vines on a portion of the property would degrade the quality of natural habitat that exists. In response, the project site currently supports 92.4 acres of non-native grassland, 10.8 acre of ruderal areas, and 3.3 acres of disturbed areas. Therefore, these disturbed areas cover more than a third of the existing site. All of these mapped areas mentioned above already exist in a degraded state.

**Response to Comment: RESOURCES – 3. Biota, c. page 27.** The comment asserts that the on-site Bouquet Canyon Creek is a tributary fed by Amargosa Creek. This is in response to the County’s statement that the project site supports two unnamed drainages. In accordance with the *Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles County, California*, there are two unnamed USGS-designated “blue-line streams” that cross the project site that are tributary to Amargosa Creek. Surface water flows through both drainage systems from southwest to northeast. Amargosa Creek does not feed into the on-site systems; rather, is the receiving water body from the on-site drainages. Further, the drainage system near the southeastern portion of the project site is not Bouquet Canyon Creek; Bouquet Canyon Creek begins approximately two miles west of the project site and flows in a south and westerly direction, away from the project site.



**Response to Comment: RESOURCES – 3. Biota, d. page 27.** The comment is in response to the County’s conclusion that two riparian corridors will generally be avoided with respect to the following Initial Study checklist question, “Does the project site contain a major riparian or other sensitive habitat (e.g. coastal sage scrub, oak woodland, sycamore riparian, woodland, wetland, etc.)?” LVTC’s comments subsequently state that several sensitive species occur in the vicinity but plant species are listed by common name rather than habitats which are the subject of the Initial Study checklist question.

In response to LVTC’s comment, none of the plant species listed have appropriate Latin names and therefore PCR cannot directly comment on their potential to occur within the project site. Nevertheless, the *Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California* documents the performance of sensitive plant surveys during the appropriate blooming periods. No sensitive plant species were found to occur on-site during these surveys.

To complete the County’s response, existing wetlands, totaling 0.01 acre of U.S. Army Corps of Engineers (ACOE)/Regional Water Quality Control Board (RWQCB) jurisdictional wetlands, occur only in the southeastern portion of the site. To address the Initial Study checklist question, this wetland area occurs within an area dominated by disturbed riparian vegetation. All on-site drainages support areas mapped as either disturbed riparian scrub or mule fat scrub. Further, no other major riparian areas or sensitive plant communities occur within the project site.

**Response to Comment: RESOURCES – 3. Biota, f. page 28.** The comment is in response to the County’s conclusion that the site has the potential to support raptor and songbird nests based upon the following Initial Study checklist question, “Is the project site habitat for any known sensitive species (federal or state listed endangered, etc.)?” As stated in the *Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California*, the following species have the potential to occur on-site based upon habitat present and species distributions: Cooper’s hawk (*Accipiter cooperi*), sharp-shinned hawk (*Accipiter striatus*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), Bell’s sage sparrow (*Amphispiza belli belli*), silvery legless lizard (*Anniella pulchra pulchra*), golden eagle (*Aquila chrysaetos*), ferruginous hawk (*Buteo regalis*), northern harrier (*Circus cyaneus*), northern red diamond rattlesnake (*Crotalus ruber ruber*), white-tailed kite (*Elanus leucurus*), prairie falcon (*Falco mexicanus*), and coast patch-nosed snake (*Salvadora hexalepis virgulata*). However, these species are Species of Special Concern or are protected from hunting but are not listed by federal or state recourse agencies as threatened or endangered. Several other sensitive species mentioned in LVTC’s comment are not expected to occur primarily due to the lack of suitable habitat. Potential impacts to sensitive species potentially occurring on-site are expected to be less than significant as impacts will not cause populations of these species to drop below self-sustaining levels. As addressed in the PCR report, the site does not support suitable habitat in the form of permanent ponded water with emergent vegetation and



perennial water flow for the California red-legged frog or any other aquatic sensitive species such as the unarmored threespine stickleback, respectively.

**Response to Comment: RESOURCES – 3. Biota, g. page 28.** The comment disagrees with the County’s determination that other factors, such as wildlife corridors and adjacent open space linkages, either do not occur on-site or will not be impacted by the proposed project. LVTC asserts that the site does support a wildlife corridor and that many species have been observed in the vicinity including grizzly bears (only black bears may occur in the vicinity as grizzlies have been extirpated from the State since the early 1900’s). The discussion below represents PCR’s opinion of the existing conditions within the site as they relate to wildlife corridors and linkages.

Movement on a “local” scale occurs throughout the surrounding vicinity as well as within the site itself. From a regional perspective, the site is situated in Leona Valley, just west of the Palmdale city limits. The site is approximately 7 miles west of State Highway 14 and 1 mile northeast of the Angeles National Forest, and does not lie within any linkages as proposed by the South Coast Wildlands Project Missing Linkages Report.<sup>1</sup> The site connects to rural residences of Leona Valley to the north, beyond which is the City of Palmdale. The rural residences to the north of the site inhibit north-south movement of wildlife through the study area. However, due to its proximity to the Angeles National Forest to the west and open space to the east and south, the site has the potential to support larger mammal species that require larger home range areas and dispersal distances or dense vegetative cover (e.g., mountain lion and bobcat). Therefore, while the project may be linked to a regional open space/habitat system, it in an of itself does not represent a movement corridor that connects large blocks of habitat through surrounding areas that are otherwise “hostile” and not conducive to wildlife movement.

**Response to Comment: RESOURCES – 3. Biota, CONCLUSION. page 29.** The comment from LVTC disagrees with the finding of “less than significant with project mitigation” and feels that based upon the location of riparian areas, the presence of sensitive species, its location within the foothills of SEA #58, its adjacency to Ritter Ridge SEA, and its location within the proposed San Andreas Rift Zone SEA, impacts are potentially significant. In response, PCR has explained in the responses above that potential impacts to jurisdictional drainages and sensitive species potentially occurring on-site are less than significant. The project site is not located within an existing SEA. A proposed update to the County General Plan, including the SEA maps and policies, is in process. However, until any modifications to the SEA program are adopted by the County Board of Supervisors, the County Department of Regional Planning only recognized the existing SEA overlay.

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<sup>1</sup> Penrod, K., R. Hunter, and M. Merrifield. 2001. *Missing Linkages: Restoring Connectivity to the California Landscape, Conference Proceedings*. Co-sponsored by California Wilderness Coalition, The Nature Conservancy, U.S. Geological Survey, Center for Reproduction of Endangered Species, and California State Parks.



**Response to Comment: RESOURCES – 6. Agriculture Resources, a. page 36.** The comment agrees with the County’s determination that the proposed project would convert farmland to non-farmland use. PCR does not disagree with LVTC’s comment that the site was historically used for grazing. However it should be pointed out that the developer is investigating the feasibility of planting approximately 100 acres – or one third of the site – in grapevines. This would increase the amount of farmland in the area. No further response is necessary.

**Response to Comment: SERVICES – 1. Traffic/Access, CONCLUSION. page 44.** The bulleted comment states, “It is not likely that Bouquet Canyon Road would be widened or improved as it winds through Angeles National Forest, parallels a Blue Line creek and is a valuable wetland habitat.” It is true that Bouquet Canyon Road parallels a USGS-designated “blue-line stream” prior to entering the site. However, only a small portion on-site was determined to support a wetland and off-site areas have not been delineated.

**Response to Comment: MANDATORY FINDINGS OF SIGNIFICANCE. page 74-75.** The comment is in response to the question, “Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?” and the County’s response; “Maybe, site has potential to support both raptor and songbird nest.” The comment by LVTC lists sensitive wildlife species known from the Leona Valley, describes sensitive plant communities under the proposed SEA, and documents sensitive plant and wildlife species included in the County’s draft General Plan. As previously mentioned and included in the *Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California*, no sensitive plant species were observed on-site during the sensitive plant surveys and no sensitive plant communities were found on-site. Further, although the project site has the potential to support both raptor and songbird nests due to the presence of trees, shrubs, and other ground cover, the following mitigation or project design feature will ensure impacts are less than significant: Any vegetation removal shall be conducted between August 16 and February 14, which is outside the nesting season, to avoid potential impacts to nesting birds. If initial vegetation removal occurs during the nesting season, all suitable habitats will be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement of clearing. If any active nests are detected, a buffer of at least 100 feet (300 feet for raptors) will be delineated, flagged, and avoided until the nesting cycle is complete, as determined by the biological monitor, to minimize impacts.

**Response to Comment: GENERAL ASSUMPTIONS AND LIMITING CONDITIONS. page 77-78.** The comments by LVTC describing where they got their information to comment on the Initial Study are accepted and no further response is deemed necessary.

Daniel Fierros  
**LOS ANGELES COUNTY**  
**DEPARTMENT OF REGIONAL PLANNING**  
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If you have any questions or comments, please contact us.

**PCR SERVICES CORPORATION**

A handwritten signature in black ink that reads "Steven G. Nelson".

Steven G. Nelson  
Director of Biological Resources

A handwritten signature in black ink that reads "Susan Anon".

Susan Anon  
Senior Biologist