

**From:** [Anita Garcia](#)  
**To:** [Alfredo Hernandez](#)  
**Cc:** [WebMail - CCD](#); [AskR5@wildlife.ca.gov](mailto:AskR5@wildlife.ca.gov)  
**Subject:** Fwd: Murphy Ranch Little League Lighting Project (Council Item 13A)  
**Date:** Tuesday, December 13, 2022 8:58:27 AM  
**Attachments:** [image.png](#)  
[Murphy Ranch MND Comments .pdf](#)

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[**NOTICE:** This message originated outside of City of Whittier -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

Please find below my project comments and attachment outlining the deficiencies of the project MND. Also, as I mentioned I was unable to locate the State Clearinghouse posting, so can you please provide me with that number.

Thank you,

Anita Juhola-Garcia

----- Forwarded message -----

From: **Anita Garcia** <[ajgarcia2010@gmail.com](mailto:ajgarcia2010@gmail.com)>  
Date: Mon, Dec 12, 2022 at 9:40 PM  
Subject: Murphy Ranch Little League Lighting Project (Council Item 13A)  
To: <[jvcc@bewleylaw.com](mailto:jvcc@bewleylaw.com)>, <[jmartinez@cityofwhittier.org](mailto:jmartinez@cityofwhittier.org)>, <[fdutra@cityofwhittier.org](mailto:fdutra@cityofwhittier.org)>, <[cathywarner@earthlink.net](mailto:cathywarner@earthlink.net)>, <[omartinez@cityofwhittier.org](mailto:omartinez@cityofwhittier.org)>, <[PubWks@cityofwhittier.org](mailto:PubWks@cityofwhittier.org)>

Members of City Council,

I wish to submit comments regarding Council Agenda Item 13A (Murphy Ranch Little League Lighting Project).

Unfortunately, I am unable to attend the public hearing so I am sending brief comments and an attachment letter outlining the California Environmental Quality Act (CEQA) deficiencies of the Mitigated Negative Declaration (MND).

- **Lack of Notification** - I reside at 15530 Lodosa Drive (a street that is identified in the MND that will be impacted by the light and glare of the proposed project) yet I never received any notification of the project or the public review period of the MND. I only happened to find out by reading an article in the Whittier Daily News. This is a City-owned parcel and the lack of outreach and transparency to impacted residents is very disappointing and negligent. In addition, I was unable to find this posting on the State Clearinghouse website, which is required for environmental impacts on area-wide resources.
- **Inconsistent with OS – Open Space Zoning** - The scope of this project with the addition of eleven (11) 60 to 80-foot tall light poles (which is equivalent to approximately 5 to 7 stories in height) and the expanded hours of operation to 10 pm, seven (7) days a week is inconsistent with the current zoning designation of OS – Open

Space. Section 18.09.040 of the Municipal Code expressly states land shall be essentially unimproved and devoted, used or utilized for the preservation of natural resources, plant and animal life, and low impact recreational uses. **The proposed project is not a low impact recreational use.**

- **Impacts to Puente Hills Preserve** - Although the intent of adding recreational opportunities to an existing ball field is an admirable goal, the location of this ball field in a highly sensitive wildlife environment makes this project ill-conceived. The Biological Assessment report included with the MND states that wildlife is frequently observed within the vicinity of the Murphy Ranch ball fields. The report concludes that sensitive species and biological resources including Coastal California Gnatcatcher, Golden Eagle, mountain lion, western mastiff bat, pocketed free-tailed bat, western red bat, western, yellow bat, nesting birds, wetland and riverine habitat, and a wildlife corridor are potentially impacted. Furthermore, areas immediately adjacent to the site contain high quality nesting bird habitat. The assessment notes that the impact to nesting birds will continue beyond just construction activity due to the lights and extended hours of operation of the ball field.
- **Noise Impacts** – The impact of noise with the increased hours of operation until 10 pm, 7 days a week is not addressed in the environmental document. The Biological Assessment Report expressly noted the potential negative impact of noise to wildlife. During the current hours of operation until dusk, noise such as spectator's cheering and noise amplification can be heard emanating from the ball field. During daytime hours due to increased ambient noise, the impact is not significant. However, the same activity lasting until 10 pm daily with decreased ambient noise from Colima Road will disturb nocturnal wildlife and the adjacent neighborhood.

I strongly urge you to not adopt the Mitigated Negative Declaration and reconsider the overall project as not an appropriate expansion in a Significant Ecological Area (SEA) nor is it a low impact recreational use as required by the OS – Open Space zoning designation.

Sincerely,

Anita Juhola-Garcia

Please consider the sensitive nature of the surrounding wildlife as called out in the Puente Hills Preserve signage.

RECEIVED ON:

Council Meeting: \_\_\_\_\_  
Agenda Item No. \_\_\_\_\_



December 11, 2022

Honorable Council Members  
City of Whittier  
13230 Penn Street  
Whittier, California 90602-1772

Re: Public Hearing Item 13A - Mitigated Negative Declaration (MND)  
(Murphy Ranch Little League Field Lighting Project)

Dear City Council Members:

Per the California Environmental Quality Act and CEQA Guidelines, the above-referenced MND is inadequate and incomplete. The following areas of the environmental document are deficient:

- (1) Project Description<sup>1</sup>** – The increased operational component of the ballfield is not mentioned in the project narrative. The addition of lighting expands the operation of the current facility extending hours from dusk to 10:00 p.m., seven (7) days a week. Depending on the time of year, this can extend operating hours up to an additional five (5) hours per day.
  
- (2) Aesthetics** – The MND asserts that all aesthetic impacts are less than significant except the creation of a new source of substantial light or glare. The project site location is characterized as urbanized in the MND. However, abutting the Murphy Ranch Little League baseball fields is Whittier’s most prominent natural resource, Puente Hills Preserve. Over 70 percent of Whittier’s total park acreage comprises natural parks within the Puente Hills Preserve. The Puente Hills Preserve is designated a Significant Ecological Area (SEA), a Los Angeles County-designated area with irreplaceable biological resources. The installation of lights ranging in height from 60-feet (equivalent to 5 stories) to 80-feet (equivalent to 7 stories) would be visible from the project site from a distance to the Puente Hills Preserve. **The MND states “The light and glare that would be generated by the project would be directly visible by residents along Villaverde Drive that are more than 160 feet south of the project site. Light and glare from the lights would also be visible to the residents along the north side of Lodosa Drive that are over 900 feet south of the project site and have direct views of the baseball fields. The Puente Hills Habitat Preservation Authority lands would be impacted by the addition of the new light source.”** The MND maintains that

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<sup>1</sup> CEQA Guidelines, Section 21065

while the project would generate new sources of light and glare from the project site compared to the existing condition, the light and glare impacts to the residents closest to and south of the site would be less than significant but without providing tangible evidence.

The Off-Field Photometric Plan for Field 1 and Field 2 included in the MND does not provide a legend or context to understand the extent of the lighting impacts to the Puente Hills Preserve and adjacent residential neighborhood. Instead the MND provides a vague statement “less than 1 foot-candle at relatively short distance from the fields” (MND, pg. 23). What constitutes a “relatively short distance” in order to substantiate a less than significant impact? Furthermore, the installation of eleven (11) light standards ranging in height from 60 to 80 feet (equivalent to 5 to 7 stories) abutting a Significant Ecological Area (SEA) with irreplaceable biological resources would contribute significant light pollution to an area that is primarily dark after dusk. Light pollution is characterized as an unwanted or excessive artificial light brightening of the night sky. For context, typical parking lot lighting is 12 – 15 feet in height, street lights range in 25 – 34 feet in height and the proposed lights are two to three times taller than a street light yet the MND states the light and glare impacts are less than significant.

The MND does not address the introduction of additional and cumulative light pollution to the ecologically sensitive surroundings. The only mitigation being proposed to address nighttime light and glare impacts is **Mitigation Measure No. 1 - The baseball field lights shall be turned off at 10 pm. A dimmer switch shall be installed to allow the lights to be reduced to 50 percent of the full light intensity for ten minutes and further reduced to 30 percent for five minutes to allow players, parents and spectators to safely get to their cars before the lights are completely shut-off at 10:15 pm.**

**(3) Biological Resources** – The MND states that there are potentially significant impacts to biological resources but fails to provide complete and adequate measures of mitigation to biological species to a level of insignificance. The Biological Assessment Report prepared for the MND acknowledges the importance of the Puente Hills Preserve as some of the last open space in the highly developed Los Angeles region. It further states that wildlife is frequently observed within the vicinity of the Murphy Ranch ball fields. The results of the Biological Assessment Report conclude sensitive species and biological resources including Coastal California Gnatcatcher, Golden Eagle, mountain lion, western mastiff bat, pocketed free-tailed bat, western red bat, western yellow bat, nesting birds, wetland and riverine habitat, and a wildlife corridor are potentially impacted. Furthermore, areas immediately adjacent to the site contain high quality nesting bird habitat. The assessment notes that the impact to nesting

birds will continue beyond just construction activity due to the lights and extended hours of operation of the ball field.

Section 5.2.3 of the Assessment Report expressly states:

“As proposed, the project has the potential to impact wildlife movement on the adjacent Preserve, part of the larger Puente-Chino Hills Wildlife Corridor. Wildlife adjacent to the project site have been documented to alter their movements due to increased recreational use within the area (Haas and Turschak 2002, Lucas 2010). Additionally, it is known that direct glare from night lighting can affect the orientation of organisms across distances (Reed et al. 1985, Telfer et al. 1987, Beier 1995, Longcore and Rich 2004). Recreation is abundant in the immediate vicinity of the project in the form of a high use trailhead and hiking trails and the existing little league field activities. Increasing the recreational use of the little league field in combination with the new impact of artificial lighting is expected to have an adverse impact on wildlife movement within the existing wildlife corridor.”

The mitigation suggested by the assessment does not provide adequate abatement due to the lack of a significance threshold and not all of the suggested measures are included in the MND. For example:

- Reduce Light Pole Height – It is recommended that the light pole height be limited to the lowest extent possible while still achieving illumination of the little league fields. Limiting the pole height will assist with reducing the emission of light and glare into offsite areas. Light poles are 60 and 80 feet in height with no reduction of height as mitigation due to increase glare in a batter’s eye.
- Reduced Light Intensity – The minimum amount of light intensity should be utilized to reduce emission of light offsite while still achieving the desired light function. Reduced light intensity mitigation is not included in MND.
- Reduced Light Duration – The duration of light use should be reduced to the maximum extent practicable. Field lights operating until 10 pm, 7 days a week is not a reduced duration but an increased source of light pollution to the dark sky of the Puente Hills Preserve.
- Longer Wavelength Lights – Utilize lights with longer wavelengths (e.g., yellow LEDs) and avoid shorter wavelength light such as blue and violet which lead to greater disruption of biological functions across the majority of wildlife species as well as humans (Longcore et al. 2015, Beier 2006, Brainard et al. 2015). If fullspectrum light is required, then the lowest possible color temperature is

recommended (e.g., yellows) (Longcore et al. 2015). **Mitigation not discussed in MND.**

- **Reduce Noise** – The use of the lights at the little league fields will also result in an increase in noise during later hours of the day. To all extents possible, efforts should be made to limit noise. This may include prohibiting the use of stereos, bull horns, and other high volume producing equipment. **Proposed mitigation in the MND is to cease the public address system and “other noise equipment” after 8 pm. This does not address noise from recreation activity and spectators. Currently, the noise from the ball field activity is heard during daylight hours when the ambient noise level is higher. After dusk when ambient noise is greatly reduced, the noise will be more intrusive to the Puente Hill Preserve Area and adjacent neighborhood. Under CEQA, all mitigation must be feasible and fully enforceable, and all feasible mitigation must be imposed by lead agencies. There is no factual evidence in the record detailing how the adverse impacts would be reduced to the less than significant level with implementation of the proposed mitigation.**

**(4) Land Use and Planning** – The MND states that the proposed project is consistent with the designated zoning of the site as OS - Open Space. However, Section 18.09.040 of the Municipal Code expressly states land shall be essentially unimproved and devoted, used or utilized for the preservation of natural resources, plant and animal life, and low impact recreational uses. Furthermore, the OS zone shall be applied to areas in which wildlands, wildlife and natural ecosystems are to be protected or conserved. Such areas may be modified to accommodate low impact recreational activities. Alterations to existing land forms and topography shall be limited. **The proposed project with the addition of eleven (11) 60 to 80-foot tall light poles coupled with the time extension of youth ball fields to 10 pm, seven (7) days a week does NOT constitute a low impact recreational use.**

**(5) Noise** – The MND did not acknowledge any potential noise impacts. The Initial Study stated less than significant impact to generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The project site is zoned OS - Open Space zone. A land that is expressly applied to areas in which wildlands, wildlife and natural ecosystems are to be protected and conserved. The Biological Assessment Report expressly noted the potential negative impact of noise to wildlife. **The expansion of an existing recreational facility located in the Open Space zone to include nighttime recreational activities extending to 10 pm, seven (7) days a week should have recognized the**

potential for significant impacts and should have warranted an evaluation of environmental impacts in the MND.

- (6) Wildfire – The MND noted that the proposed project site is located within a very high fire hazard severity zone in a Local Responsibility Area (LRA). The MND provided a mitigation measure for construction workers to leave the site if a wildfire should occur. However, there was no discussion about wildfire mitigation for project occupants during the operation of the ball fields. The proposed lighting and expanded hours of operation brings more wildfire risks by exposing more people to the very high fire hazard severity zone. **The MND is deficient in addressing the potential impact to project occupants in a very high fire hazard severity zone.**

CEQA is intended to inform government decisionmakers and the public about the potential environmental effects of proposed activities and to prevent significant, avoidable environmental damage. As prepared, the MND does not adequately disclose or mitigate significant environmental impacts of the project.

In addition, CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. Although the intent of adding recreational opportunities to an existing ball field is an admirable goal, the location of this ball field in a highly sensitive wildlife environment makes this project ill-conceived. The potential impact to the adjacent Puente Hills Preserve is significant and not without consequences. Adding light poles that are five to seven stories high and operating the youth ball field to 10 pm, 7 days a week is not an appropriate expansion in a Significant Ecological Area (SEA) nor is it a low impact recreational use as required by the OS – Open Space zoning designation. **I urge you to not approve this project.**

Sincerely,

A handwritten signature in blue ink that reads "Anita J. Garcia". The signature is written in a cursive, flowing style.

Anita J. Garcia  
15530 Lodosa Drive  
Whittier, CA 90605