

# WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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December 17, 2008

Mr. Mark Herwick  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

## Comments on Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008

Dear Mr. Herwick:

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 the Whittier-Puente Hills and the Cleveland National Forest in the Santa Ana Mountains. WCCA offers the following comments on the Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008.

### Puente-Hills Significant Ecological Area

In general, we support the more inclusive Significant Ecological Area (SEA) boundaries as proposed in the Draft General Plan and we commend the County on applying this approach. We also appreciate the County's proposal to include the wildlife linkages from the Missing Linkages report on the SEA map. A portion of the Puente-Chino Hills is identified as one of these linkages. However, we continue to recommend that the southwest portion of the Aera property be included in the Puente Hills SEA. In the Puente Hills Landfill Native Habitat Authority (Habitat Authority) letter, dated August 29, 2007, the Habitat Authority makes a compelling scientific argument for the inclusion of this biologically significant area. Although this area is used for oil drilling, it clearly meets the criteria for SEAs. It is not clear that in the County's process of delineating SEAs whether the County had a consistent process for exclusion of an area even if it met the criteria.

WCCA continues to be concerned with the narrow width of the proposed SEA in the center of the Puente Hills SEA. This area is narrower than in the version included in the SEA Update Study. There is no conceivable ecological justification to reduce the SEA width in this location. In WCCA's September 27, 2007 letter, we identified this area as Area A. At the scale of the SEA map online, we are unable to definitively provide more specific comments. According to County staff, maps at a better scale, that can be overlain on other layers such as aerials, will be

provided online by the County in December. We look forward to reviewing those maps and providing more specific comments on this area at that time.

### **Open Space Dedications**

WCCA concurs with many of the goals, policies, and implementation actions in the Conservation and Open Space element such as Policy C/OS 2.1, "Develop and expand regional and local parkland in the County," and Implementation Action C/OS 1.1, "Coordinate with Local, State, and Federal park agencies and conservancies to acquire open space for recreation and biotic preservation throughout the County." However, implementation actions should be added at the beginning of the plan's life to encourage or require open space dedications as part of the development process. For example, Implementation Action C/OS 2.2 could be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require permanent open space dedications and protection as part of the development process to mitigate adverse environmental impacts. Open space dedications must be offered to open space park agencies or another entity acceptable to the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

In addition, under the Design Guidelines for SEAs (p. 135), we recommend adding the following underlined language:

2. At a minimum, retain a contiguous area of undisturbed open space over the most sensitive natural resources to maintain regional connectivity within the undeveloped area, and preserve this area in perpetuity through a recorded fee simple dedication to an open space park agency prior to the issuance of any permits.

We strongly support Policy C/OS 5.7, and we recommend the following underlined language be added:

Require that development mitigate "in-kind" for unavoidable impacts to biologically sensitive areas and permanently preserve mitigation sites, via fee simple dedications or permanent deed restrictions prior to the issuance of any permits.

To acknowledge the role that public conservation agencies have in the acceptance of open space dedications, the following underlined text should be added (p. 124, Section II. Open Space, Parks, and Recreation):

For the purposes of the General Plan, open space dedications are defined as privately owned lands that have been set aside for permanent open space, or dedicated in fee title or protected in some other manner by a conservation agency, as part of a larger land development proposal. Commitment of such lands to open space use in perpetuity is typically assured through deed restrictions or dedication of construction rights secured at the time of concurrent with, but not later than, development permit approval, or by protection by a conservation agency.

It is critical when County planners are reviewing development proposals, that they are aware of the locations of not only publicly-owned parks and open space, but also privately-owned land protected by conservation easements or deed restrictions. This is an important tool when planning the locations of developments and where future open space should be set aside. It is preferable that contiguous blocks of open space be protected, rather than ending up with disjointed patches. The following implementation action should be added:

Implementation Action C/OS 2.3. Within six months of approval of the General Plan by the County create, and update periodically, a GIS layer of protected open space owned by Federal, State, County, or other local agencies or non-profits to assist staff in the project review process and aid applicants in their project design. As the following information becomes available, the layer must include other protected lands, such as conservation easements and permanent open space deed restrictions.

### **Trail Dedications**

WCCA concurs with many of the trail measures in the General Plan, including Policy C/OS 4.1, "Expand multi-purpose trail networks for all users." As with open space dedications, we suggest that implementation actions be added to encourage or require trail dedications as part of the development process.

Implementation Action C/OS 4.2 could be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require trail easement dedications as part of the development process to mitigate adverse recreational impacts. Trail easement dedications must be offered to open space park agencies or another entity acceptable to the County.

Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

We support Implementation Action C/OS 4.1, as a GIS layer of proposed trails is a valuable tool for County planners to have when reviewing development applications. Knowing the locations of nearby existing trail easements is also highly valuable in order to successfully site a trail easement on a particular property so that it connects to any trail easements on adjacent properties, or so that it will eventually connect to easements on nearby properties. We recommend that the following underlined language be added:

Within six months of approval of the General Plan by the County, create, and update periodically, a GIS layer of proposed federal, state, county and adjacent city trailways and trailway segments, and existing and proposed trail easements and offers to dedicate trail easements, to assist staff in the project review process and aid applicants in their project design. Field verification should be conducted to determine the legitimacy of trail locations.

### **SEAs and Biological Protections**

We support the County's identification of the linkages, from the South Coast Wildlands Missing Linkages project, on Figure 6.3, Proposed SEA map. We also compliment the County on the inclusion of several important policies to protect SEAs. However, we do recommend some modifications such as adding the following underlined text to Policy C/OS 5.6:

Require that developments within an SEA be designed to meet the Significant Ecological Area Technical Advisory Committee recommendations, to the greatest extent possible, even it that means some substantial diminution of the property's economic value, and to...Preserve wildlife movement corridors; Site roads to avoid sensitive habitat areas or migratory paths;...Provide open or permeable fencing.

We support the Design Guidelines for a Model Subdivision Project in an SEA (p. 135) to locate development away from wildlife corridors... (5), avoid impermeable fencing outside the development... (6), and direct outdoor lighting downward, away from adjacent open space areas (7). We recommend adding the following design guidelines: "Site and design roads to avoid significant adverse impacts to wildlife movement." WCCA recommends that all of these design guidelines apply to any development, not just subdivisions within an SEA.

We continue to strongly recommend against making all single-family homes in SEAs exempt from Significant Ecological Area (SEATAC) review (see WCCA's September 27, 2007 letter). Single family estates with vineyards, accessory structures, and other uses can be more damaging than a cluster of three moderate-sized homes. The exemption should be amended to state:

Individual single-family residences that will result in less than 5,000 square feet of surface area grading, where only one residence is proposed to be built on a legal lot or parcel of land, including project-related grading impacts.

We strongly support the Implementation Action C/OS 5.3 (p. 139), although we recommend modifying the text (see also Schlotterbeck 2003<sup>1</sup>):

~~Consider~~ [A]dding a new section to the Initial Study Checklist to create a review procedure for open space connectivity. Habitat connectivity reviews shall consider the physical linkages on the project site and how it will maintain both local and regional habitat connectivity.

We also support Implementation Action C/OS 5.2 (p. 139) to create a formal Mitigation Land Banking Program. However, it is not clear why this would only be mitigation for development in areas outside of SEAs, and why it could not include mitigation for development inside SEAs.

Per the General Plan, additional information on the regulatory provisions of SEAs is included in the Technical Appendix; per the website the technical appendices will come later. We would appreciate the opportunity to comment on that technical appendix when it becomes available.

The County's Draft General Plan recognizes the challenges at the urban-wildland interface (p. 138). We recommend that another implementation action be added:

Implementation Action C/OS 4.6. Create guidelines for developments to minimize edge effects at the urban-wildland interface, which may include options for specific actions to manage pets, restrict lighting in open space, create compatible landscaping, etc.

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<sup>1</sup>Schlotterbeck, J. 2003. Preserving Biological Diversity with Wildlife Corridors: Amending the Guidelines to the California Environmental Quality Act. *Ecology Law Quarterly* 30(4).

Because of the cumulative impacts to native habitat from the conversion to vineyards, we recommend that the General Plan include the following policy (in Section IV. Agricultural Resources):

“Policy C/OS 6.9. In remaining native habitat open space areas, discourage the extensive conversion of sensitive native habitat to agricultural land.”

### **Scenic Resources**

We support the Policy C/OS 11.1, to “[I]dentify and protect scenic resources,” and Implementation Action C/OS 11.1. “Create a scenic corridor and scenic viewshed program and/or ordinance to protect the County’s remaining scenic resources.” We concur with the Habitat Authority’s (see letter dated August 29, 2007) support of considering Colima Road, Hacienda Road, Harbor Boulevard, and the 57 Freeway as Scenic corridors and adding Turnbull Canyon Road as a scenic corridor. We note that State Route 57 from the County line to State Route 60 is identified as Eligible Scenic Highway on Figure 6.6., Adopted and Eligible Scenic Highways. We do not see these other roadways identified in the VI. Scenic Resources section of the Conservation and Open Space Element. We anticipate this will be included in the Technical Appendices (p. 149) to be available at a later date, and we look forward to reviewing them once they become available.

### **Park Uses**

As many parks are located in the Open Space land use designation, it is important that necessary park facilities and operations are allowed in the Open Space land use designation. For example, in many cases, park agencies have acquired open space land and used existing buildings for staff residences or offices. We recommend that the following language be added to the open space land use designation (p. 39), under Open Space Conservation (OS-C), Open Space Parks and Recreation (OS-PR), and Water (OS-W): “Includes passive recreation (e.g., trails) and open space parks and all associated support facilities/uses customarily found in conjunction therewith.”

If possible, we also recommend that the following specific language be included under these categories:

This includes, but is not limited to: park offices and staff residences, camp stores, parking, restrooms, camping, trails, habitat restoration, signage, park fencing/gates, and temporary uses typically allowed in the State Park system.

Also, park agencies will acquire land in the County in non-Open Space land use designations, such as Rural land use designations. It is important that park agencies can open and operate these parks right away for public use, for example, as required by some

funding sources. It would be cumbersome to complete a General Plan amendment immediately to change the land use for every land that is acquired by a park agency in order to open and operate the park. We recommend that the following underlined language be added (p. 27):

Purpose:...[T]he Rural designations:...Preserve areas of significant natural and scenic resources and allow for passive recreation and open space parks and all the associated support facilities/uses customarily found in conjunction therewith.

Under Intensity of Use (pp. 27-28), the underlined language should be added (and should be added to all Rural Land designations):

Rural Land 1. Rural land uses include single family homes, equestrian uses, agricultural and related activities, and other rural activities at one (1) dwelling unit per acre (1 du/ac) density, and passive recreation and open space parks and all associated support facilities/uses found in conjunction therewith.

Because park agencies may acquire land in other land use designations (other than Open Space or Rural), we recommend a blanket statement in the General Plan in the Conservation and Open Space Element (for example, under Goal C/OS-2, p. 132), such as the following:

Allow property in any land use designation to be used for passive recreation (e.g., trails) or open space parks and all associated support facilities/uses customarily found in conjunction therewith.

We recommend that Policy C/OS 4.2 be expanded to address other important park facilities to accommodate multiuse trail users (e.g., differently-abled individuals):

Promote strategically located staging areas, and trail heads, and other support facilities (e.g., parking, campsites, restrooms) to accommodate multiuse trail users.

Also, because many open space parks are established based on the presence of valuable biological resources, they are by definition likely to be included in the County's proposed SEAs. It is important that the SEA regulations proposed in the General Plan do not impede park uses and facilities. We recommend that there be language added to the SEA regulations such as:

Passive recreation and open space park and associated support facilities and uses shall be allowed in SEAs. This includes, but is not limited to camping.

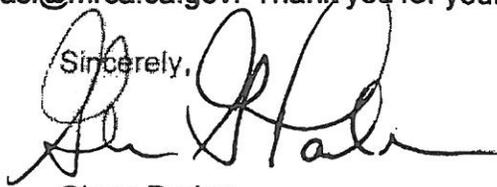
parking, restrooms, signage, habitat restoration, park fencing/gates, and other uses typical of the State Parks system.

#### Open Space Categories

For the open space designations, the category: "Other Park and Conservancy Land," (p. 124, and on the Open Space figure) should be modified as follows: "Private recreation areas, private deed restricted open space, ownership by cities, other local agencies, joint powers authorities, and non-profits, and beaches..." The following underlined text should also be added (p. 123): "Existing open spaces in the County include national forests, state, county, city, and other local parks, and nature preserves."

If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3200, ext. 121 or by email at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov). Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Parker". The signature is fluid and cursive, with a large initial "G" and "P".

Glenn Parker  
Chairperson

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September 27, 2007

Bruce W. McClendon, FAICP  
Department of Regional Planning  
General Plan Development Section  
County of Los Angeles  
320 West Temple Street, Room 1390  
Los Angeles, California 90012

## Comments on the Los Angeles County General Plan Update

Dear Mr. McClendon:

The Wildlife Corridor Conservation Authority (WCCA) provides the following comments on the Los Angeles County Draft Preliminary General Plan, proposed Significant Ecological Area (SEA) Ordinance, and the proposed Hillside Management (HMA) Ordinance. WCCA was created for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente-Chino Hills and the Cleveland National Forest in the Santa Ana Mountains. WCCA has been following this General Plan development process closely and has provided comments on the General Plan Update in letters dated December 20, 2002 and July 7, 2004, and on the proposed SEAs in letters dated April 30, 2001 and May 2, 2001. We have attached those letters, and they are incorporated into this letter. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and an ellipsis means the text should remain unchanged.)

### Puente Hills Significant Ecological Area Boundaries

As stated in WCCA's previous letters, WCCA commends the County and its consultants on the excellent work done for the update of the SEAs. Specifically, WCCA compliments the County's efforts to propose more inclusive and biologically sound boundaries to ensure sustainability of the SEAs. This is evident in the proposed Puente Hills SEA.

While the scale of the mapping of Figure 5.3 is not sufficient to do a complete review the Puente Hills SEA boundary, we do recommend three important changes. First, we recommend that an area east of Harbor Boulevard, at the southern boundary of the County to be included in the Puente Hills SEA. We made this recommendation in our April 30, 2001 letter to the County, and we identified it as Area 6, and it is shown on the attached color map. This area is a buffer for a canyon which forms a critical wildlife link south of Shea Homes across Harbor

Boulevard. This area appears to support the federally threatened species, coastal California gnatcatcher, and this area is functionally integral to the remainder of the proposed Puente Hills SEA. The SEA map for the Rowland Heights Community Plan should be updated to reflect inclusion of this Area 6.

Also, WCCA requests that the County consider connecting and making wider the area identified as "A" on the attached color map. It appears that the width of the proposed SEA has been made smaller in this area and in fact now the western and eastern portion appear to be disconnected, compared to the SEA boundary in the 2000 SEA report (PCR Services Corporation et al. 2000a). Extensive amounts of money have been spent to preserve nearly 4,000 acres in the western portion of the wildlife corridor. We recommend that the County staff reevaluate this area with a careful review of the 2000 SEA report, existing aeriels, and existing plant communities to consider a wider SEA here in recognition of the regional connectivity of the western portion of the wildlife corridor to the remainder of the wildlife corridor to the east.

WCCA concurs with the inclusion of an area identified as Area 5 in WCCA's April 30, 2001 letter and this area is shown on the attached color map. This area forms the entrance to a small canyon which is a critical wildlife link and the area is core habitat of the western Puente Hills. The SEA map for the Rowland Heights Community Plan should be updated to reflect inclusion of this Area 5.

Our third recommendation is the inclusion of all land within the Puente Hills Landfill site that lies to the east and north of the areas designated for landfill operations in the current Conditional Use Permit. This would include land adjacent to Hacienda Heights and the Pomona Freeway. Good native habitat is present in this area and inclusion of this area would help link San Jose Creek and Whittier Narrows to the rest of the Whittier-Puente-Chino Hills wildlife corridor. The landfill will be closed in the future, and the final closure plan will determine the final use and habitat value of the landfill. This extension of the Puente Hills SEA would include those portions of Area 1, as identified in our April 30, 2001 letter, but exclude those areas designated for landfill operations in the current Conditional Use Permit. See also attached color map.

WCCA recommends that the County provide larger maps of the individual SEAs, that are overlain on relevant layers (e.g., topography) for reference, to facilitate the review by the public in future public review documents.

### **Management of Significant Ecological Areas**

In a previous letter (May 2, 2001), WCCA supported the management practices recommended in the 2000 SEA studies (PCR Services 2000a, 2000b). WCCA continues to support those recommendations. WCCA recommends that these management

practices be more explicitly incorporated into the General Plan and the SEA Ordinance. Specifically, the Background Report recommends that development of properties within SEAs should disturb no more than 20 percent of the SEA. It would be appropriate for the County to incorporate this into the SEA Ordinance and to establish a simple monitoring system that is checked periodically (e.g., every 5 years) to ensure consistency with this requirement.

### **Significant Ecological Areas Development Review**

Under the Draft Preliminary General Plan, projects in an SEA, unless exempt, will be subject to one of two regulatory processes: 1) Minor Conditional Use Permit (CUP) without Significant Ecological Area Technical Advisory Committee (SEATAC) review (Minor SEA-CUP), or Conditional Use Permit for SEA (SEA-CUP) with SEATAC review.

As stated in our July 7, 2004 letter, WCCA continues to be concerned about certain exemptions from SEATAC review for projects within SEAs. These include single-family homes, accessory structures to a primary use, and grazing. There are countless scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts. These types of activities can be particularly problematic if the development and vegetation removal occur in sensitive habitat areas near water sources used by wildlife (such as mammals), or near a habitat linkage chokepoint. Extensive grazing over a large area, can result in significant degradation to native plant communities and sensitive species. If the County chooses to retain single-family homes as an exemption, then this exemption should be amended to state:

Individual single-family residences that will result in less than 5,000 square feet of surface area grading, where only one residence is proposed to be built on a legal lot or parcel of land, including project-related grading permits.

These procedures also state that for project(s) on parcels located partially within an SEA, but with the development area outside of the SEA, the activity is exempt. Such a sweeping provision would not work with lots 2-acres or larger because both non-structural and future development can result in significant, ecological adverse impacts. For this reason, the proposed single family exemption from a CUP leaves a significant gap in protection. Any acreage above and beyond 2-acres should either be permanently protected with an irrevocable deed restriction or a conservation easement to a public park agency. Such deed restriction or conservation easement must prohibit all future development, including agriculture, non-native plants, equestrian facilities, non-fire department required brush clearance, and golf courses.

If the County chooses to retain grazing of horses or other animals as an exemption, then this exemption should be amended to state:

Grazing of horses or other animals and the construction of corrals as an accessory use, provided that the grazing and corrals occupy less than ½ acre, as allowed by the land use designation, zoning, and other applicable county regulations including, but not limited to, Chapters 12.36, 12.32, and 17.04 of the county code.

For activities that may not require a building or grading permit, but that have the potential to significantly impact SEAs, the County should develop procedures that specify a clear requirement for SEATAC review (e.g., for vegetation removal ½ acre or greater).

Furthermore, the SEA Regulatory Review Procedures for CUPs (including SEATAC review) should provide the highest level of protection because realistically, large scale subdivision projects could potentially result in the greatest impacts to the SEAs. The following statement in the Draft Preliminary General Plan (p. 120) should be amended to state:

"Recommendations ~~may~~ will include the clustering of structures away from sensitive areas, and then dedicating that area as natural open space to a public park or conservation agency. Other recommendations may include limiting lighting, protecting habitat linkages and movement corridors, using open-wildlife-permeable fencing, and maintaining a short distance between existing infrastructure and new development to limit grading of natural vegetation."

## **Biological Resources**

Consistent with WCCA's comments in previous letter (July 7, 2004), we make the following comments. It is critical to amend the following policy to the Conservation/Open Space Element Policy (C/OS) 5.1 in order to secure adequate protection of SEAs, given the potential for significant adverse environmental impacts from development in SEAs.

Maintain and monitor the program and network of Significant Ecological Areas (SEAs). Proposed developments in SEAs shall include mitigation for unavoidable impacts to SEAs from the removal, conversion, or modification of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

WCCA supports Item 6 of Section F. Burden of Proof in the SEA Ordinance, which states: "Roads and utilities are located and designed to prevent damage to biotic resources or wildlife movement..." Similarly, the following policy should be added after Policy C/OS 5.1 to promote, monitor and ensure efforts to protect wildlife corridors. This should also be added to the Circulation Element under Goal C-3 pertaining to an environmentally sensitive circulation system.

Site roads to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as road kill) during continued operation of existing roadways and construction of new and expanded roadways.

Policy C/OS 5.3 addresses maintaining the integrity of the County's diverse plant communities. Coastal sage, a sensitive plant community, should be considered in this policy, in addition of those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game.<sup>1</sup> It has been estimated that about 70-90 percent of the pre-settlement coastal sage scrub in Southern California has been destroyed primarily by residential development (Noss et al. 1995). Coastal sage scrub also supports a suite of sensitive wildlife and plant species. The County should revise the statement C/OS 5.3 as follows: "Maximize the ecological function of the County's diverse natural habitats, such as Joshua Trees, native Oak woodlands, coastal sage scrub, walnut woodlands, and perennial grasslands."

### **Protection and Dedication of Natural Open Space**

WCCA supports several of the goals and policies of the Conservation & Open Space Element including, but not limited to, Policy C/OS 1.1, "Promote the acquisition and preservation of open space areas throughout the County" and Policy C/OS 1.2, "Create an established network of open space areas that provide regional connectivity...from the southwestern extent of the Mojave Desert to the Puente-Chino Hills."

Of note, when land is set-aside to be protected as permanent natural open space as part of the development review process, it is vitally important that legal mechanisms be put in place to avoid any confusion in the future regarding whether that land was intended to be protected in perpetuity. Equally important, the land that is to be protected as natural open space should be put under the ownership of a park or conservation agency, with the experience and mission to adequately protect that open space. To this end, ownership by a homeowners' association (HOA) is not adequate permanent protection for natural open space (e.g., endangered or rare species habitat, sensitive native plant communities, etc.).

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<sup>1</sup> See sensitivity rankings "Sensitivity of Top Priority Rare Natural Communities in Southern California," determined by the California Department of Fish and Game.

HOAs sometimes have missions and goals that are conflicting with the primary purpose of protecting the natural land. Ownership and/or management by HOAs of landscaped or modified areas is appropriate.

WCCA concurs with the intent of the language regarding proposed dedicated open space in several places in the Draft Preliminary General Plan and the Proposed SEA Ordinance. WCCA recommends the following changes to Section J. Conditions 2. Open space:

...Natural [o]pen space, where proposed or required, shall be permanently dedicated in fee to a public park or conservation agency, ~~held under common ownership~~, or other means acceptable to the regional planning commission or planning director, which extinguishes future development rights and to the maximum extent feasible, is contiguous [with] natural open space[.]

Similarly, in the Hillside Management Ordinance, WCCA recommends the following changes to Section M. Required Conditions:

1. Open Space. Open space shall be permanently dedicated and comprised of at least 25 percent of the net area of a development in an urban land use category, and at least 70 percent of the net area of a development in a rural land use category. Open space shall be contiguous natural open space, and shall be permanently dedicated in fee to a public park or conservancy agency ~~or held under common ownership~~...

### **Hillside Management Ordinance and Scenic Resources**

WCCA concurs with several policies and guidelines in the Scenic Resources section of the Draft Preliminary General Plan, such as #1 in Figure 5.6: Design Guidelines for a Model Project in Hillside Management Areas, which state: "Minimize grading and removal of natural vegetation."

WCCA recommends that the following statement to be amended to # 9, as follows in Figure 5.6: "Preserve ~~significant~~ sensitive trees and habitats, natural watercourses, wildlife corridors and distinctive natural features."

Los Angeles' landscape is filled with hillside, scenic resources. It is essential to recognize the need to preserve important significant viewsheds found within the County. WCCA strongly recommends that the grading percentage qualification be reduced from 25 percent to 15 percent under the Hillside Management Ordinance and the Hillside Management CUP. The natural topography and biological resources enable the residents of Los Angeles County to enjoy all the scenic resources, including the hillsides.

### Trail Network

There are several existing and proposed trails within the Puente-Chino Hills shown on the fold-out map entitled: Los Angeles County Riding and Hiking Trails (prepared by Department of Parks and Recreation 2001) in the Puente-Chino Hills area, that are not shown on Figure 5.2, Trail Network of the Draft Preliminary General Plan. These include Schabarum Extension Connector Trail (15), Rowland Heights Connector Trail (17), Rowland Heights Loop Trail (18), and portions of Schabarum Extension Trail (14), west of Fullerton Road. If these are not to be included, we respectfully request a justification for why each is proposed to be excluded. Otherwise, these should be included in the General Plan. As the Draft Preliminary General Plan states (p. 115): "Future development of trails will be easier to complete in areas with ample open space and parkland, such as...Puente Hills..."

Thank you for your consideration. If you have any questions, please contact Judi Tamasi of our staff at (310) 589-3200, ext. 121 or at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov).

Sincerely,



Bob Henderson  
Chairperson

### Literature Cited

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