WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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November 19, 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 letter, dated August 29, 2007, the Habitat Authority makes a compelling 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 and Trail Dedications

WCCA concurs with many of the goals and policies 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 Policy C/OS 4.1, "Expand multi-purpose trail networks for all users." We suggest that implementation measures be added to encourage or require open space and trail dedications as part of the development process. For example, Implementation Action C/OS 2.2 could be added, which states:

> Encourage or require open space dedications as part of the development process to mitigate adverse environmental impacts. Open space dedications should be offered to open space park agencies or another entity acceptable to the County.

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

> Encourage or require trail easement dedications as part of the development process to mitigate adverse recreational impacts. Trail easement dedications should be offered to open space park agencies or another entity acceptable to the County.

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

> 2. At a minimum, ~~R~~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 dedication of fee title 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 title dedications or permanent deed restrictions prior to the issuance of any permits.

SEA and Biological Protections

We support the Design Guidelines for a Model Subdivision Project in an SEA (p. 135) to locate development away from wildlife corridors (5), and avoid impermeable fencing outside the development (6). 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 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 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 deleting the text that is shown in strike-out:

> ~~Consider~~ add~~ing~~ a new section to the Initial Study Checklist to create a review procedure for open space connectivity. Connectivity reviews shall consider the physical linkages on the project site and how it will maintain regional connectivity, particularly with regard to wildlife corridors.

We also support Implementation Action C/OS 5.2 (p. 139) to create a formal Mitigation Land Banking Program.

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.

Scenic Resources

We support the Policy C/OS 11.1, to "[I]dentify and protect 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 do not see these 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.

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 that will result in no significant adverse impacts to natural resources."

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 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: "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 (p. 27)." 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."

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.

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. Thank you for your consideration.

Sincerely,

Glenn Parker
Chairperson