

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

GLENN PARKER

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CITY OF BREA

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November 4, 2015

City of Chino Hills
Community Development Department
14000 City Center Drive
Chino Hills, California 91709

**Hidden Oaks Country Club Specific Plan 13SP01 and Vesting
Tentative Tract Map 18869 Notice of Preparation
and Initial Study**

Dear Ms. Lombardo:

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 Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. It is one of our main goals to ensure that sufficient continuity of habitat can be preserved to maintain a functioning wildlife corridor within this area.

According to the Initial Study (IS; p. 3), the project consists of the Hidden Oaks Country Club Specific Plan. The Plan would serve as a tool to guide the implementation of a 107-unit single-family residential subdivision on the approximately 537-acre property. WCCA concurs with the comments provided by California State Parks in their October 14, 2015 letter on the Notice of Preparation. WCCA offers the following additional comments.

Need for Analysis of Wildlife Movement and Habitat Connectivity

The project site is located within the Puente-Chino Hills Wildlife Corridor. Due to the location of the site and scale of the project, the project has the potential to result in significant adverse impacts to wildlife movement. The Draft Environmental Impact Report (DEIR) should include an analysis of wildlife movement and habitat connectivity, both pre-project and post-project. The General Plan requires a wildlife movement study for any project potentially adversely affecting wildlife movement (Action CN-1.2.7). The existing conditions should inform the design of the project in order to avoid any significant adverse impacts to wildlife movement. This analysis should include a topographic map and aerial image, vegetation mapping (if available), along with land ownerships of the open space adjacent to, and near to the site. This study should cover a radius of at least 2,500 feet from the edge of the property in order to get a

complete picture of wildlife movement on, adjacent, and near to the project site. Chino Hills State Park should be clearly shown, as well as any other permanently protected lands adjacent to and nearby the project site. This analysis, including land ownerships, is necessary to understand the post-project conditions and likelihood of any remaining wildlife movement areas to be maintained in perpetuity. Known and potential wildlife movement areas onsite and adjacent to the site should be identified.

Project Modifications and Alternatives

WCCA strongly recommends that the Proposed Project be modified to consolidate the remaining open space. The current development configuration results in a patchwork of disjointed open space, with extensive edges along the development areas. The analysis of wildlife movement and habitat connectivity (described above) should inform these project changes. If the applicant does not change the project footprint, then at least one alternative should be included in the DEIR that provides a substantially reduced project footprint, with more intact natural open space remaining onsite.

WCCA recommends that the project be modified to incorporate the following changes. If the applicant chooses not to make such changes, at least one alternative in the DEIR should reflect these changes. The proposed development south of the exceptionally prominent ridgeline should be deleted. The currently proposed residential lots (1-42) in two cul-de-sacs would remain. This would result in a larger, more intact open space area that borders the State Park and potentially other protected open space. The currently proposed project, including the development located south of that exceptionally prominent ridgeline (lots 43-108), would result in unavoidable, significant adverse impacts to biological resources.

Clearly there are numerous constraints on the site including steep topography, ridgelines, drainages, desire to balance cut and fill, and sensitive plant communities. The DEIR should present a substantially reduced project footprint alternative, either as described in the preceding paragraph or in another alternative presented by the applicant that achieves the same goal of retaining much more intact open space. It is incumbent upon the applicant to provide a feasible alternative that retains substantially more intact open space, while taking these constraints into consideration.

Need to Minimize Edge Effects

The DEIR should clearly identify the potential edge effects that would result from the proposed development. It is preferable to design a project to minimize the extent of open space areas that are subject to edge effects, rather than design extensive edge areas that will need constant monitoring and enforcement.

Extensive lighting around developments can deter wildlife from moving at nighttime and lead to a host of other adverse impacts to wildlife. WCCA recommends that outdoor lighting be minimized, especially adjacent to open space areas. The DEIR should outline what measures would be taken to minimize outdoor lighting. Outdoor lighting should be minimized, restricted to low-intensity features, shielded, concealed to the maximum feasible extent, directed downward, and directed toward the targeted area(s) only. Outdoor lighting should avoid light trespass onto non-target areas and use best available dark skies technology. Lighting for the following uses should be avoided: sports courts, driveways and access roads, and perimeter of property for aesthetic purposes. A lighting plan outlining the measures to minimize night lighting should be developed and included in the permit application to the City.

Fencing adjacent to the open space areas should be limited to the hardscape footprint or to Zone A of the fuel modification zone. Any additional fencing beyond that (within the open space) should be wildlife-permeable. The DEIR should include measures to control cats from entering the open space areas. Because of the concern for invasive landscaped plants invading adjacent open space land, we recommend that any landscaping plan exclude any invasive plants. The DEIR should also address through mitigation measures the adverse effects from irrigation and introduction of Argentine ants into the open space areas.

Protection of Remaining Open Space Onsite

The EIR should clarify the number of acres of remaining undisturbed open space from the project that does not include fuel modification. The IS (p. 4) states 449 acres would be left in a natural state. Figure 2-7 shows 119 acres impacted (so 418 acres remaining). Fuel modification impacts may not be included on this figure.

According to the IS (p. 4), the natural open space will be maintained by the homeowners' association (HOA). We respectfully recommend that the HOA not be responsible for maintaining the open space. We have seen repeatedly examples where HOA management desires and strategies conflict with the purpose of maintaining the open space in its natural state in perpetuity for wildlife. We recommend that the open space be dedicated in fee title to a public conservation and/or park agency that has a primary goal of conservation of natural open space. Alternately, a conservation easement could be recorded to such agency. Any fuel modification areas should be excluded from a fee title dedication and should be included in a conservation easement.

In either case (fee title dedication or recordation of conservation easement), we strongly recommend that the DEIR include (and the City include in its Conditions of Approval) that a maintenance endowment be required. Other funding alternatives include establishment of a community facilities district or allocation of a portion of annual HOA dues. It should

Joann Lombardo, City of Chino Hills
Hidden Oaks Country Club Specific Plan 13SP01
November 4, 2015
Page 4

be not be the responsibility of the public agency accepting the dedication or conservation easement to fund the maintenance, in essence subsidizing the development. Such dedication of open space or recordation of conservation easement, and establishment of maintenance endowment or other funding mechanism, should be done prior to vegetation removal or construction.

Consistency with General Plan

The DEIR should include a complete discussion regarding how the proposed project and alternatives are consistent with the conservation goals, policies, and actions in the General Plan (see Attachment 1 for selected excerpts). For example, Action CN-1.1.3 states: "Preserve as much open space as possible along canyon roadways such as Carbon Canyon, Soquel Canyon, and the canyons adjacent to Chino Hills State Park."

We appreciate your consideration of these comments. Please keep our agency to your mailing/email list for this project. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at judi.tamasi@mrca.ca.gov.

Sincerely,

Glenn Parker
Chairperson

Attachment 1
City of Chino Hills General Plan Conservation Excerpts
(Not a complete list)

Goal CN-1: Preserve Chino Hills' Rural Character

Policy CN-1.1: Preserve and protect Chino Hills' rural and natural scenic qualities

Action CN-1.1.1: Protect identified extremely prominent ridgelines, prominent ridgelines, and knolls.

Action CN-1.1.2: Preserve the character of natural open spaces by integrating existing natural features into new development.

Action CN-1.1.3: Preserve as much open space as possible along canyon roadways such as Carbon Canyon, Soquel Canyon, and the canyons adjacent to Chino Hills State Park.

Policy CN-1.2: Preserve and protect Chino Hills' biological resources.

Action CN-1.2.1: Preserve natural open spaces that act as wildlife corridors.

Action CN-1.2.2: Discourage new development in areas that contain sensitive, rare, or endangered species, oak woodlands, chaparral, and riparian habitats

Action CN-1.2.3: Preserve oak woodlands, riparian areas, and fresh water marshes to the maximum extent feasible.

Action CN-1.2.4: Require City approval to remove trees that in the opinion of the City function as an important part of the City's or a neighborhood's aesthetics character.

Action CN-1.2.5: Limit channeling of streams to the minimal improvements necessary for flood control as determined by a City approved project-specific hydrologic analysis, and encourage these improvements to have a natural appearance.

Action CN-1.2.7: Require a wildlife movement study for any project, including any new or extended roadway, potentially adversely affecting wildlife movement. This shall include identification of, and if warranted mitigation to protect, existing habitat linkages, wildlife corridors, wildlife movement in the vicinity, and crossing structures at freeways and major roadways; and recommended project design changes and avoidance, minimization, and mitigation measures to offset potentially significant adverse impacts to wildlife movement. For a new or extended roadway that is anticipated to result in a significant adverse impact to wildlife movement, require project design changes and/or avoidance, minimization,

Joann Lombardo, City of Chino Hills
Hidden Oaks Country Club Specific Plan 13SP01
November 4, 2015
Page 6

and/or mitigation measures which could include, but not be limited to: construction of wildlife crossings (e.g., underpass, overpass), fencing to guide wildlife, native plant restoration, and/or a lighting plan (to ensure that any new lighting does not deter wildlife through remaining habitat linkages).