Project site should be defined. Is it the same as project parcel(s) or lot(s)?

(1) Landscape plants are not restricted to **locally native plants**. Could this be done with an exemption for cases of health and safety?
§22.52.2640.A, p.7

(2) There is no statement about **development in a floodplain**. For reasons of health and safety as well as biological impacts, it could be a standard of development that project development be outside of all floodplains. (Projects in floodplains would need review.)
§22.52.2640 (addition)

(3) Should **barbed wire** be allowed?
§22.52.2640.C.3, p.8

(4) Habitat linkages seem to be restricted to those studied by South Coast Wildlands Missing Linkages project, which was used to create the SEA Habitat Linkages and Wildlife Corridors Map. SEATAC has repeatedly stated the South Coast Wildlands studies are not exhaustive. (Even K.Penrod of South Coast Wildlands has stated this.) There needs to be allowance for other linkage areas. Should "encroachment" be limited to cases with narrowing to less than 1000 ft. for linkages and 200 ft. for corridors? Should closure of a linkage on the map be the only criterion for loss of SEA viability due to linkage impact?
Sections that might be changed:
§22.52.2640 H, p.10
§22.52.2640 I, p.10
§22.52.2670 C.1.e, p.18
§22.52.2670.H.3.b, p.27

(5) What about **drainages without riparian** resources?
§22.52.2640.K.3.c, p.12.

(7) **Single-family residences**, regardless of accessory structure number, are exempt from review, as long as they meet design standards. (Previously, single-family residences without additional discretionary development, were exempt.)
§22.52.2650.A.1, p.12.

(6) **Edge effects** can impact SEA resources, and this is presently handled to some extent by SEATAC review for all projects in parcels with SEA overlay. Now projects that are adjacent to SEA overlay in the same parcel, but without direct development in SEA overlay, will not be reviewed by SEATAC.
§22.52.2650.A.2, p.12.

(7) Projects within SEA overlay that are classified as "disturbed" according to the GIS-prepared map "SEA Developed or **Disturbed Areas Map**" will not be reviewed by SEATAC. This exempts illegally disturbed areas, if mapped, inside the SEAs and focuses development there, and may exempt projects developing on semi-natural areas (if

mapped) that are of value to the SEA. It might exempt ag areas (if mapped), and focus development there.
§22.52.2650.A.2, p.12.
Conflicts with §22.52.2670.C.1.d, p.18?.

(8) Projects of types generally **beneficial to biotic resources would not be reviewed** by SEATAC.
§22.52.2650A.5, p.13

(9) Open space mitigation is focused on like-for-like, whereas certain types of declining natural habitat possibly should have higher priority, at least on the parcel(s) of the project, such as drainage with doubled or even wider buffers, woodlands.
§22.52.2670.E.2, p.20

(10) Parcel conditions may be subdivided. Is this going to lead to considerable confusion? Will it lead to damage due to edge effects?
§22.52.2670.E.2, p.24

(11) **Findings should include reference to CEQA, Appendix G.IV**.
§22.52.2670.H.1, p.26

(12) Staff report findings list of targets for **open space contents** seems limited: could also include species identified in the SEA descriptions, new sensitive species for the SEA, species at the limits of their natural ranges, habitat linkages or portions of habitat linkages
§22.52.2670.H.2, p.27