

## Leon Freeman

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**From:** douglaspfay@aol.com  
**Sent:** Wednesday, April 23, 2014 7:06 AM  
**To:** DRP General Plan Project  
**Subject:** Fwd: SEAs comments by Douglas Fay for PC hearing April 23, 2014

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Also,

The Santa Monica Bay is ESHA and SEA. It needs to be restored back to its historic ecological function and enhanced above this threshold.

Sewage and other discharges into the Bay must be phased out and ultimately banned and prohibited within the GPU language.

-----Original Message-----

From: douglaspfay <douglaspfay@aol.com>  
To: genplan <genplan@planning.lacounty.gov>  
Sent: Tue, Apr 22, 2014 10:28 pm  
Subject: SEAs comments by Douglas Fay for PC hearing April 23, 2014

Dear GPU & PC Representatives,

Absent from the proposed SEAs is the Oxford Basin (OB), which is part of the historical Ballona Wetlands. The OB was dedicated a Bird Conservation Area (BCA) by the County in 1963. It was a planned bird refuge/sanctuary as mitigation for the construction of the Del Rey Harbor as outlined in House Document No. 389, circa 1954. It is documented in a 1963 Los Angeles Times article that it took professor Roland C. Ross 6 years working with officials and agencies to get the basin dedicated at this location. Professor Ross described guidelines for the BCA.

Many members of the public have requested the BCA be recognized as ESHA.

It is recognized by the California Audubon Society as an Important Bird Area (IBA). In fact, all the waters of Marina Del Rey are recognized as IBA and should therefore be recognized as ESHA, or at a minimum SEA.

The Los Angeles County General Plan Update (GPU) needs to include the definition of a BCA and corresponding mapping.

The GPU needs to include the definition of an IBA and corresponding mapping.

The GPU process policies, goals, and language needs to ensure that the proposed SEA designation is consistent to, or exceeds, ecological protection levels of current designations and is compatible with State and Federal designations.

SEAs must be protected from becoming receiving areas for urban runoff that exceeds a minimum threshold of compromising water quality. In other words, don't allow policy language that promotes polluting natural habitat areas or potential ecological areas with urban runoff. Wastewater and runoff waters need to be treated to potable levels before they are introduced to living creatures.

The GPU needs to include language that states SEAs, ESHAs, and BCAs shall not be under the management of LA County Flood Control.

The GPU needs to include the definition of a pipeline project

The GPU needs to include policy language that states current and future pipeline projects that impact habitat areas shall be prohibited.

Respectfully requested and submitted,

Douglas Fay  
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