



December 2, 2014

VIA ELECTRONIC MAIL

Regional Planning Commission
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

RE: Item 6, Dec. 10, 2014: General Plan Update (Plan Amendment No. 02- 305)

Dear Chair and Members of the Commission:

The Endangered Habitats League (EHL) appreciates the opportunity to provide written testimony on this item. For your reference, EHL is Southern California's only regional conservation group. We are generally supportive of this project and urge its adoption 1) with additional improvement and 2) absent environmentally harmful changes.

In this latest draft, we appreciate improvement in some policies, such as fire hazard, and find continued merit in many of the Conservation and Natural Resources policies. However, particularly urge you to revisit the land use maps as follows:

A review of the draft land use maps shows that several areas with SEA, other biological, or fire constraints have inappropriately high densities. These areas include West Chatsworth in the Santa Monica Mountains, around La Crescenta in the San Gabriel Mountains foothills, and Diamond Bar/Tonner Canyon in the Whittier-Chino-Puente Hills. These locations should be redesignated as RL40, or RL20 if existing parcelization precludes the lower category. It should be noted that parcel sizes in the Diamond Bar area are currently as large of 160 acres.

In addition, other organizations have suggested modest expansions of SEAs, such as in the Whittier-Chino-Puente Hills, and we urge appropriate rectification.

Finally, it is essential that your Commission avoid the last minute corruption of the science-based SEAs as occurred in the Antelope Valley Area Plan.¹ These late changes were an affront to a publicly accountable process and significantly compromised the integrity of the County's framework for biological resources.

¹ Your Commission rolled back 11,600 acres of SEAs in the Central and East EOAs. To begin with, these EOAs were vastly over-scaled beyond any legitimate planning or employment generating rationale. The Board of Supervisors then, after public comment had closed, created a new, unanalyzed exemption for minor subdivisions affecting over 200,000 acres within SEAs.

Thank you for considering our views.

Yours truly,

A handwritten signature in blue ink, appearing to read "Dan Silver", is displayed on a light gray rectangular background.

Dan Silver
Executive Director

cc: Richard Bruckner, Director, Dept. of Regional Planning
Mark Child, Dept. of Regional Planning
Connie Chung, Dept. of Regional Planning
Interested parties