Southern California
Los Angeles and Ventura
Counties Chapter

ASSOCIATION OFFICERS
Howard Press, Watt Communities
BIA/LAV President

Greg Medeiros, Centennial Founders
BIA/LAV Vice-President

Scott Ouellette, KB Home
BIA/LAV Treasurer

Darrin Shannon, Gothic Landscape
VP of Associates

Aleks Baharlo, KFG Investment Co.
BIA/LAV Past President

BOARD OF DIRECTORS

George Dickerson, All Promotions Etc.

Bart Doyle, D. Bart Doyle Attorney at Law

John Hadley, Diversified Pacific Group

Keith Herren, Williams Homes

Al Lee, Lennar

Ken Melvin, Standard Pacific Homes

Eileen Merino, CDS Insurance

Tom Mitchell, Newhall Land

John Musella, The Musella Group

Mike Nix, Toll Brothers

Henrik Nazarian, Hall & Foreman Inc.

Randy Patterson, SARES-REGIS Group

Ben Rocca, Richmond American Homes

Sara Soudani, Lawyers Title

Rich Villaseñor, KB Home

Norm Witt, Cook Hill Properties

February 3, 2014

Emma Howard
ehoward@planning.lacounty.gov
LA County Department of Regional Planning
320 W Temple Street Room 1354
Los Angeles, CA 90012

Re: Comments Draft 4 of the Significant Ecological Area (SEA) Ordinance released on December 5, 2013

Dear Emma,

The Building Industry Association of Southern California, Inc., Los Angeles/Ventura Counties Chapter (BIA) is a regional trade association that represents more than 1,000 member companies and their respective employees involved in building new homes in Southern California. On behalf of our membership, we are submitting comments on Draft 4 of the Significant Ecological Area (SEA) Ordinance, which was released on December 5, 2013.

The BIA serves as the collective voice of the home building industry. In this instance, the facts, opinions and information contained herein are the result of a coordinated effort of an esteemed group of industry leaders who have genuine concern for the future of homebuilding in Los Angeles County. This group of industry leaders, part of the BIA's governmental affairs committee, are the "best of the best" when it comes to thoughtful and responsible use of the County's land resources to create thriving and sustainable communities.

The BIA acknowledges the improvement in the latest draft ordinance, particularly with respect to the definitions, and applicability. To our disappointment, however, many of the BIA's prior concerns, outlined below, have largely not been considered, and there has not been significant movement on some of the key adverse components of the SEA Ordinance. We remain deeply concerned about the overreach of the ordinance, and the lengthy, complex, burdensome and duplicative process that project applicants will endure under the procedures outlined in the SEA Ordinance and the SEA Program Guide, which are in addition to the requirements under CEQA. Furthermore, thorough review has been difficult, due to incomplete materials. For example, both the Connectivity and Constraints Area Map and the Disturbed Area Map are not available, making a comprehensive review of the ordinance impossible. The BIA governmental affairs committee would like a working group meeting with

County staff to address the SEA Ordinance, the SEA process and the SEA Program Guide.

Fundamentally there are still many vague and conceptual issues that need to be properly clarified and vetted prior to public review of final draft ordinance. For example:

- Terms are defined, but not used consistently or rigorously within the Ordinance. For example Section 2905 defines "Development" in a way that is virtually synonymous with "disturbance". On page 5, 2905.E defines "Developed Area" as "areas that have been developed" (note: small "d" developed – not a defined term). Thus, it is not clear whether a Developed Aera is one that has undergone "Development" (i.e. previously been disturbed), or something else.
- Similarly, 2905.E excludes "those (areas) that have been developed for agricultural purposes", which may or may not mean an "Agricultural Developed Area" defined in 2905.D. This occurs throughout the draft, as the provisions haphazardly use or avoid using defined terms.
- We also have circular definitions in which one of the passages defining Development (2905.C.6 on page 5) refers back to "development as defined herein".
- Also, definition 2905.S on page 7 in which Water Resources is defined in part as "the types of surface water protected by this part 28".
- In terms of overreach, the draft contains the breathtakingly broad statement that the term Development includes "Off-site activities that occur... as a result of development" (2905.C.6 on page 5). By that definition, SEA regulation might extend to include the lumber yard that provides building materials.
- Similarly, the Applicability of Use Restrictions (2910.A) removes all doubt as to whether a landowner retains any vestige of control over his property with the strikingly broad statement that "A person shall use any... land wholly or partially located within an SEA only as specifically permitted by this Part 28."
- Existing and historic uses are not necessarily grandfathered. The definitions for Habitat Preservation Area and Natural Open Space (2905 H & I) operate to ensure that acreage used for habitat restoration falls into the "Development" category, which will increase the acreage forfeitures in section 2940.
- Add in Item 2905.C.6, and offsite habitat restoration anywhere in the County becomes SEA Development.

We could go into great depth on numerous other concerns, given the complexity of these issues, we will defer that detail until we have an opportunity to meet in person. However, we would like to continue to provide a brief summary of the BIA's primary concerns.

Primary Concerns

For Development Projects, the SEA Program disjointedly overlays CEQA and other state and federal regulations, and severely restricts and removes the Supervisors' contextual land-use discretion and authority.

- Development projects are subject to CEQA, pursuant to which project impacts on species, habitats and corridors are evaluated. CEQA allows for mitigation, mitigation banking ,etc. to be implemented, thus providing a pathway for a project to proceed, despite its impacts.
- The proposed Ordinance requires in certain instances the preparation of reports that mirror the reports that must be prepared under CEQA for EIRs and, in some instances, for MNDs and NDs. Rather than requiring the unnecessary duplication of cost, effort and time, the proposed Ordinance should provide that documents prepared under CEQA be submitted for use under the Ordinance.
- State and Federal agencies establish scientific criteria for protecting threatened and endangered species and habitats. There is no need for the County to use its limited resources to enact sweeping and duplicative regulations. Why is it necessary for the staff biologist to measure the depth of a river or large lake, and how will this be done?
- The role of the staff biologist has expanded far beyond its expertise, and staff biologist duties, as outlined in the SEA ordinance, exceed the County's staff resources. This will cause unnecessary delay to projects in the SEATAC process.
- The SEATAC procedures manual (page 5) provides that "If the proposed mitigation strategy will not fully mitigate the impact, then that impact should be declared unavoidable and significant." This is inconsistent with CEQA, which allows for an impact determination of "less than significant" even when the impact is not fully mitigated.
- County staff should provide a flow chart of how the SEATAC process integrates with subdivision processing and the CEQA process. Despite the CEQA process, and the County's intimate involvement in that process, a project applicant may endure multiple rounds with SEATAC until a staff report is finally settled upon for public hearing.
- SEATAC's final "Ruling of Compatibility" is inconsistent with the CEQA process, thus insuring a duplicative, burdensome and potentially circular environmental review process. Applicants are encumbered with multiple SEATAC meetings to address endless requests for information, causing lengthy delays.
- Multiple duplicative reports are required to comply with both the SEATAC Program and to obtain CEQA clearance for a project.
- The proposed SEA Ordinance uses the County's land use authority to stop virtually all development on or near land designated as an SEA, because it presumes that preservation (not mitigation) is the only allowable and appropriate strategy to address environmental impacts. This approach is contrary to law.
- Projects will be denied at the staff level. The result is a de facto development moratorium that takes away discretion from the Board of Supervisors to make land use decisions in the County.
- The findings, as currently proposed, allow staff and SEATAC to reject a project if they are not satisfied, usurping and preempting the discretionary authority of the Board of Supervisors.

- The SEA ordinance should recognize areas already identified as suitable for conservation and development and should provide that 1) SEA boundaries align with the existing conservation plans and, 2) the existing conservation plans be recognized as suitable mitigation. Examples of this are the Desert Renewable Energy Conservation Plan and the Tejon Ranch Conservation and Land Use Agreement.

Once land is designated as being in an SEA, there is no mechanism to remove the SEA designation without a General Plan Amendment.

- The process assumes that a landowner is "guilty until proven innocent" and it is virtually impossible to be found innocent. Once land is designated as being in SEA (whether this designation is accurate or not), the landowner may not be able to develop at all.
- Once land is designated as being in an SEA, there is no swift way to avoid the SEA process even where the facts plainly warrant such avoidance. As the ordinance is currently proposed, even if and where it is relatively easily shown that there actually is no unique resource requiring protection, the landowner still must obtain a CUP and may also need to obtain a General Plan Amendment to modify the SEA boundary.

The SEATAC committee membership requires balance and fairness.

- The SEATAC process is not balanced and lacks a thoughtful membership structure. The committee is made up of disproportionately conservation-minded individuals; and – unless a fairer balance is assured – it will lack perspective from the development industry and expertise associated with diverse protection and mitigation strategies. At a minimum, to provide diversity, the SEATAC board should include seats reserved for development expert categories including biologists, engineers, land planners, developers and biologists endorsed by developers who regularly represent developers in seeking project approvals. The SEATAC Board should reflect a solutions-based diversity of perspectives. The SEATAC board must not be an "exclusive club for the benefit of its members" which is dominated by conservation-minded environmental experts. The selection process does not insure that won't happen.
- Members of SEATAC have limited requirements to disclose conflicts of interest; and there is insufficient vetting and diversity of its membership. The integrity of SEATAC must be questioned when reports prepared by qualified biologists and submitted by project applicants are rejected without explanation.

The proposed expansion of SEAs is unfounded

- The proposed five-fold expansion (from 125,000 to 645,000 acres) characterizes nearly one-third of the unincorporated land as containing "unique and special" resources. The 487,000-acre expansion – or 760 square miles – includes nearly one-third of the unincorporated County.

- The expansion is based on limited data, information and reports cobbled together, which taken together constitute insufficient grounds on which to impose the substantive and procedural burdens that are proposed.
- A cohesive and comprehensive study and survey of the all the SEA areas was not done in a consistent and uniform manner. In 1999, the Board of Supervisors authorized only $275,000 to fund studies of the SEAs. This was supplemented by aerial and map-based reviews, and ratified through a mere 1-day "review" by biologists. The panel only expanded SEA designations; nothing was removed, even though the designations presented were plainly overly-inclusive. There clearly has not been enough data compiled in a comprehensive and consistent scope of study to justify a five-fold expansion of the SEA boundary.
- The latest drafts now include "ecological transition areas" and "connectivity areas" which further expand the land subject to the SEA ordinance.

Further editing of the proposed SEA Ordinance is required to render it consistent with other requirements and ordinances, and legally enforceable.

- The proposed SEA Ordinance remains inconsistent with other requirements. For example, there is no rational basis for prohibiting barbed wire fencing in an SEA area where livestock are kept or allowed to graze. As another example, brush clearance is prohibited without compliance with this proposed Ordinance, despite Fire Department requirements.
- Certain of the proposed Ordinance's definitions are circular (e.g., "Developed Area"), and certain terms are undefined still (e.g., "Revised Exhibit A" and "Revised Site Plan").
- Documents referred to in and/or relied upon by the proposed Ordinance are still not available for public review (e.g., "SEA Connectivity and Constriction Areas Map"). Without the information contained in these documents, the full import of the proposed Ordinance cannot be reviewed and commented upon by the public.

We respectfully urge the County to revisit its entire approach to revising the SEA program. The proposed Ordinance must respect and integrate other regulatory and CEQA processes and have mechanisms for balancing impacts, implementing mitigations, rather than harshly providing avenues to deny projects or overburden them to the extent that development is essentially prohibited. We therefore ask that the County establish processes with sufficient flexibility to accommodate the diversity of the unincorporated County land. It's time to revisit the need to amend the SEA Ordinance and ask why the County is compelled to amend the ordinance. What are the goals? How can the process be made equitable, more efficient, less duplicative and less cumbersome when combined with other regulatory processes? It seems the process of amending the SEA Ordinance has grown into a larger monster of a CEQA-type process before an unbalanced decision-making body, outside of and not coordinated with the CEQA process.

The County must provide for future housing and economic development. The sweeping land-use proposals currently being contemplated by the County's staff will, taken together and if adopted, constitute a functional building prohibition in many areas of the unincorporated County. When one

adds together the proposed downzoning being considered in connection with the new general plan and the new restrictions and requirements proposed in the drafts of the SEA Ordinance and the Hillside Management Ordinance, the County is aiming toward severely restricting development outside the current urban boundary – virtually creating a prohibition on greenfield development. Greenfield development, when undertaken sensibly, provides a necessary opportunity to supply single-family, detached housing, which remains the #1 consumer-demanded form of homeownership.

The County needs to accommodate foreseeable growth in population, with the alternative to a reasonable mix that includes some Greenfield development being only the so-called "stack and pack" land planning that solely increases the density and intensity of land uses within in the urban boundary. The currently-proposed fundamental shifts in land planning will have unintended consequences, which must be studied and mitigated through a balanced and well-rounded approach to housing growth. We ask the County to reconsider its current path and work to modernize the SEA program by finding an appropriate balance between conservation and growth.

We welcome a dialog to further the discussion on this very important issue; and we hope to have an opportunity to meet with County planning staff in a working group meeting similar to the recent meeting on the Hillside Management Ordinance.

Sincerely,

Tim Piasky
Chief Executive Officer

C: Richard Bruckner, Director of Regional Planning

CALCIMA
California Construction and
Industrial Materials Association

April 11, 2014 VIA EMAIL

Ms. Emma Howard
Los Angeles County, Department of Regional Planning
320 W. Temple Street, Room 1354
Los Angeles, CA 90012

RE: Comments Regarding Draft 5 of the Significant Ecological Areas

Dear Ms. Howard,

CalCIMA is a statewide trade association representing construction aggregate, ready-mix concrete and industrial materials producers in California. Our members supply the materials that build our state's infrastructure, including public roads, rail, and water projects; helps build our homes, schools and hospitals; assists in growing crops and feeding livestock; and plays a key role in manufacturing wallboard, roofing shingles, paint, glass, low-energy light bulbs, and battery technology for electric cars and windmills.

We are deeply concerned with the proposed Significant Ecological Areas (SEA) overlay which, as currently drafted, would create direct and detrimental conflict with current and future aggregate materials operations located in the Antelope Valley and Santa Clara River Valley areas of Los Angeles County. Our members' facilities are located on finite mineral deposits, and often, such deposits have been identified by the State as significant to the Los Angeles region or to the State as a whole. These facilities have been in operation for years and are already subject to extensive and repeated environmental review. Expanding the SEA to include these mineral resource deposits and facilities and forcing projects to undergo even more extensive review is illogical and unnecessary.

The classification of aggregate resources in the three-county area of Los Angeles, Orange and Ventura was followed by a "designation" process performed by the State Mining and Geology Board (SMGB). This process formally recognized significant deposits that could provide for future needs and was conducted in full compliance with CEQA. Maps and descriptions of the deposits were placed in the California Code of Regulations and officially transmitted to those county and city governments empowered with authority over the use of those lands. The proposed SEA overlay is therefore in direct conflict with the already- identified needs of the County and the State of California.

CalCIMA
1029 J Street, Suite 420
Sacramento, CA 95814
Phone: 916 554-1000
Fax: 916 554-1042

Regional Office:
1077 E Pacific Coast Hwy, # 342
Seal Beach, CA 90740
Phone: 562 370-7129
Fax: 916 379-5742

www.calcima.org

The State has continued to express concern about aggregate availability. The 2012 California Geological Survey *Sustainable Aggregates* report states that the County will require more than 476 million tons of aggregates over the next 50 years while only 77 million tons are currently permitted. Thus, according to the State's expert agency, the County has permitted less than 20% of construction aggregates needed to meet its projected need. Increasing the SEA overlay over significant mineral resource areas would directly conflict with the recognized needs of the County. Additionally, the proposed SEA expansion would pose considerable challenges to any future plans for aggregate companies to expand their operations, creating serious long-term impacts to the County through significant losses of high-paying jobs and tax revenue.

Increasing the review of a reclamation plan for surface mining by the Significant Ecological Areas Technological Advisory Committee (SEATAC) and the added bureaucratic authority of SEATAC to make recommendations on a surface mining site is unreasonable. A surface mining reclamation plan is highly technical and is produced by experts in the mining industry, including geologists, engineers, and landscape architects. Any additional review by an appointed SEATAC official would be unnecessarily duplicative, burdensome and costly.

As a statewide association, CalCIMA represents the majority of aggregate producers in the potentially impacted area. As of yet, none of our members have been notified that their facilities and properties could potentially be included within the proposed SEA overlay. We therefore respectfully request that our members and other property owners have due process of notification in the future. Sending mass email blasts to the public has proven to be a wholly inappropriate and ineffective communication method, which does not achieve "meaningful" notice, and therefore fails to provide due process.

Based on the foregoing, CalCIMA requests that the SEA ordinance be revised so that any mineral resource deposits classified as MRZ-2 or designated as regionally significant are excluded from the coverage of the SEA overlay.

As the County continues in the SEA process we would certainly be amenable to meet to discuss our industry's specific issues.

Sincerely,

Angela Driscoll,
Director, Local Government Affairs

cc: Richard Bruckner – Director, Regional Planning
Edel Vizcarra – Supervisor Antonovich Office

From: Elisabeth Landis
Sent: Saturday, February 08, 2014 5:48 PM
To: DRP General Plan Project
Cc: Emma Howard
Subject: Re Chatsworth Reservoir Preserve status

I sent in comments on Appendix E: Significant Ecological Areas in the draft Los Angeles County General Plan this past week.
In those comments I questioned why, in the Santa Susana Mountains and Simi Hills SEA, the Chatsworth Reservoir/Preserve was classified as a "superfund cleanup site".
Chatsworth Reservoir/Preserve is an extremely important wildlife linkage with valuable chaparral habitat, valley oak woodlands, wetland habitat and valuable native american sites.
On Thursday, at a meeting on the cleanup of Santa Susana Field Lab, which was identified in the SEA description as the source of the contamination, I spoke to a California Department of Toxic Substance Control (DTSC) staff person about this classification of Chatsworth Reservoir/Preserve as a "superfund cleanup site".
She had no knowledge of any such designation.
For your information, DTSC is supervising and leading the cleanup of the Santa Susana Field Lab site. It is not a superfund cleanup site.
I went to the DTSC website to check their database of all cleanups of any kind being done in the Chatsworth Reservoir/Preserve area.
There are NO cleanups listed in the Chatsworth Reservoir or the Chatsworth Preserve area.
The DTSC website database of all cleanups in California is EnviroStor at this website address:
www.envirostor.dtsc.ca.gov/public/
Please correct this extremely incorrect designation of Chatsworth Reservoir/Preserve immediately!
Betsey Landis
Los Angeles / Santa Monica Mountains Chapter California Native Plant Society

From: Carla Bollinger
Sent: Monday, April 14, 2014 9:43 AM
To: Emma Howard
Cc: mark.osokow
Subject: RE: Correction: SEA Profile: Section 23: Santa Susana Mountains and Simi Hills SEA: Chatsworth Nature Preserve

Thank you, Emma, for clarifying the General Plan process, time schedule. Carla

From: Emma Howard
Sent: Monday, April 14, 2014 8:02 AM
To: Carla Bollinger; Connie Chung; Susan Tae
Cc: mark.osokow
Subject: RE: Correction: SEA Profile: Section 23: Santa Susana Mountains and Simi Hills SEA: Chatsworth Nature Preserve

Carla,

Draft 5 is a draft of the SEA Ordinance only. The descriptions are part of the General Plan documents and will be updated on a slightly different timeframe. Our biologist has reviewed the notes, and has made changes to the descriptions, but you are correct that the public release version of the description has not yet been updated. I know the changes will be made before we close the public hearings in August. SEA related issues will be coming back to the Regional Planning Commission on June 25th, so the changes will most likely be done by then, but I am copying my supervisor, Susie and Connie Chung, the section head for the General Plan, in case they have a different schedule in mind.

I am sorry that we weren't clear about the schedule for these changes. Please feel free to call me if you'd like to discuss the timeframe and SEA changes further.

Regards,
Emma

From: Carla Bollinger
Sent: Friday, April 11, 2014 3:25 PM
To: Emma Howard
Cc: mark.osokow
Subject: FW: Correction: SEA Profile: Section 23: Santa Susana Mountains and Simi Hills SEA: Chatsworth Nature Preserve

Hi Emma,

I was disappointed to see in the SEA profile: Section 23 on the 5th draft that there were not changes from the 4th draft as outlined below. You mentioned you were planning to have a staff biologist work on fixing the areas as outlined. Has the biologist reviewed the issues but didn't have time to update between the 4th draft and the 5th draft?

Carla Bollinger

To: Emma Howard and Connie Chung

Los Angeles County
Department of Regional Planning

February 10, 2014

Reference: Draft 4: Santa Susana Mountains and Simi Hills SEA, "Chatsworth Reservoir"

I am writing to clarify a statement in the Proposed SEAs Profile, Draft 4, "Chatsworth Reservoir" located in the section "23. Santa Susana Mountains and Simi Hills SEA." There is a reference under Chatsworth Reservoir paragraph that the Chatsworth Reservoir is a "superfund clean-up site due to the dumping of chemicals from a rocket facility that used to be in the Simi Hills". This is an inaccurate statement. The Chatsworth Reservoir, renamed in 1994 Chatsworth Nature Preserve (CNP), has never been and is not now a superfund clean-up site and this reference needs to be omitted from the SEA.

The paragraph also states the "Chatsworth Reservoir is now dry". The reservoir on the 1300 acre site site was drained and no longer serves as a resevoir due to closure after the 1971 Sylmar earthquake; DWP determined the reservoir was not seismically safe. The statement "the reservoir is now dry" misrepresents the importance of the nature preserve not only as an integral part of the Santa Susana Mountains-Simi Hills wildlife corridor but also as the only grasslands in Los Angeles County with seasonal wetlands, vernal pools, and life-giving marshes it supports for plants and wildlife.

Please make these changes before the final draft:

1. Delete the reference to the Chatsworth Reservoir as a superfund clean-up site as noted.
2. Chatsworth Reservoir needs to be changed to Chatsworth Nature Preserve.

Details about the CNP can be seen on our website: www.savechatsworthpreserve.org. We will also write and submit to you an accurate and complete description of the CNP for the Final Draft.

Thank you,

Carla Bollinger
CNP Coalition Delegate
SSMPA Board Member

From: Carla Bollinger
Sent: Monday, February 17, 2014 12:22 PM
To: Emma Howard
Cc: DRP General Plan Project
Subject: Correction: SEA Profile: Section 23: Santa Susana Mountains and Simi Hills SEA: Chatsworth Nature Preserve
Importance: High

Chatsworth Nature Preserve Coalition

Working together to save a crucial wildlife area in Los Angeles-San Fernando Valley
A meadowlark needs a meadow to sing …

February 17, 2014

Dear Emma Howard:

The Chatsworth Nature Preserve Coaltion is submitting a correction to the Draft 4 Santa Susana Mountains/Simi Hills SEA 23, specifically referencing the Chatsworth Reservoir, with correct name, Chatsworth Nature Preserve (CNP) wherever the name is used in this document or in county records. This revision is for page 1, under "General Boundary and Resource: Please delete "Chatsworth Reservoir" and replace with "Chatsworth Nature Preserve" towards the bottom of the 1st paragraph and in the 2nd paragraph, beginning with "From Chatsworth Reservoir" … again delete Chatsworth Reservoir and replace with Chatsworth Nature Preserve. On Page 4, paragraph beginning with "Open Space within the SEA supports …. (change this last sentence that reads, "Chatsworth Reservoir forms a portion of the south boundary and is currently dry, except for a small detention basin north of the reservoir.) We request the following replaces this sentence and the paragraph that follows in the SEA to read:

Chatsworth Nature Preserve forms a portion of the south boundary and is one of the last remaining combined oak woodlands-grasslands-seasonal wetlands in Los Angeles County.

Chatsworth Nature Preserve, 1300 acres of open space, teems with wildlife. More than 200 species of birds are on the site including: Residents: Greater Roadrunner, California Quail, sapsuckers, woodpeckers, herons and egrets; Migratory Birds: Canada Goose, Western Meadowlark and Tricolored Blackbird, as well as a variety of ducks and shorebirds; Raptors: Ferruginous Hawk, Red-tailed Hawk, Prairie Falcon, Long-eared Owl, and many others; Amphibians and Reptiles: Western spadefoot toad, slender salamander, western skink, ring-necked snake, red racer and much more; Larger Animals: gray fox, coyote, raccoon, and occasional visits of bobcat, cougar and mule deer. During seasonal rains, the CNP become seasonal wetlands with vernal pools and groundwater runoff from Simi Hills' sandstone boulders and canyon creeks. Habitat includes an oak woodlands and savanna, riparian areas, chaparral, grassland, and rock outcroppings. Rare native plants such as Santa Susana tarplant, and many-stemmed dudleya are found on the preserve. On the north end of the CNP is an Ecology Pond with its fringing live-giving fresh water marsh, an extremely scarce habitat in the County and Southern California. This Ecology Pond which was developed from

an old detention basin in 1974, is on the Pacific Flyway and supports numerous migratory birds, especially waterfowl, during the winter and through the spring and fall migratory periods. The importance of the Ecology Pond is enhanced by its proximity to the grasslands. This creates one of the last complete habitats for waterfowl, in particular Canada Geese, in the San Fernando Valley. This also makes the location valuable for bird and amphibian study by students, researchers, and naturalists. The Ecology Pond also serves the County by providing water for helicopters to suppress wildfires in the area. The periphery of the CNP is savanna, with a mixture of valley and coast live oaks (*Quercus lobata and Q. agrifolia*), some in small stands.

The majority of the SEA is within the unincorporated area of the County.

Thank you for your consideration,

Carla Bollinger
CNP Coalition Delegate
SSMPA Board Member
Society Officer

Mark Osokow
CNP Coalition Delegate
SFV Audubon

23. Santa Susana Mountains and Simi Hills SEA

Location

General

The Santa Susana Mountains and Simi Hills Significant Ecological Area (SEA) is located northwest of the San Fernando Valley within unincorporated areas of the County and the City of Los Angeles, west of Chatsworth. The area is south of State Route-126 and the Santa Clara River, west of the Interstate-5, and includes much of the Santa Susana Mountains to the north, the Santa Susana Pass, Chatsworth Reservoir, and the eastern portion of the Simi Hills to the south. This SEA encompasses much of the natural area of the Santa Susana Mountains in the County. The north face of the Santa Susana Mountains is the southwestern watershed of the Santa Clara River in the County, and on the south face, the Santa Susana Mountains are part of the direct coastal watershed as well as part of the watershed of the Los Angeles River. The Simi Hills are part of the direct coastl drainage in their southern area. The variations in vegetation communities are extensive. The area in the Santa Susana Mountains covered by the SEA is considered an important connective wildlife corridor among the San Gabriel Mountains, the Santa Clara River, and the Santa Monica Mountains.

The SEA is located at least partially in each of the following United States Geological Survey (USGS) 7.5' California Quadrangles: Calabasas, Canoga Park, Oat Mountain, Santa Susana, Val Verde, and Newhall.

General Boundary and Resources Description

The entire western boundary of the SEA follows the Ventura-Los Angeles County line from El Escorpion Park, west of the intersection of Valley Circle Boulevard and Vanowen Street in the West Hills community of the San Fernando Valley, and north to an area just south of the Santa Clara River near Salt Canyon Road. El Escorpion Park is adjacent to state park land just across the Ventura-Los Angeles County line. The small ridgeline where the SEA begins just south of El Escorpion Park separates the coastal drainage of Las Virgenes (tributary of Malibu Creek) from drainages that flow into the San Fernando Valley and the Los Angeles River. El Escorpion Park is at the southern end of Bell Canyon Park, which is also on Ventura-Los Angeles County line. The watercourse of Bell Canyon flows through the park. The SEA continues north, including the natural watershed of Dayton Canyon. Here on the southern side of Dayton Canyon is designated critical habitat for the Braunton's milk vetch (*Astragalus brauntonii*), which is a locoweed that prefers a substrate of intermixed sandstone and carbonate beds, which is probably deposited at the margins of a former seacoast. The SEA circles around the community of Lakeside Park , which is excluded from the SEA, and then encircles and includes the Chatsworth Reservoir along boundaries of private property. The western boundary of the SEA follows the Ventura-Los Angeles County line, but bends to exclude development in upper Woolsey Canyon and Chatsworth Lake Manor.

From Chatsworth Reservoir, the SEA continues north with the west side along the Ventura-Los Angeles County line and the east side tracing natural habitat at the edge of the Simi Hills and the San Fernando Valley. The SEA extends eastward to include all of the Santa Susana Pass area, much of which is preserved in the Santa Susana Pass State Historic Park. Just across the Ventura-Los Angeles County line near State Route-118 in Ventura County are Corriganville Park, a former and current natural movie production area, and Rocky Peak Park. Corriganville is a regional park of the City of Simi Hills; Rocky Peak Park is administered by the Santa Monica Mountains Conservancy. Rocky Peak Park is the former Runkle Ranch and stretches from State Route-118 five miles northward to Las Llajas Canyon. The Park is a vital wildlife habitat linkage between the Simi

Hills and the Santa Susana Mountains. Spectacular sandstone boulders, outcroppings, oak savannahs, and perennial water sources provide diverse habitat for vertebrates and a number of rare plants. The Ventura-Los Angeles County line and the SEA boundary cross directly over Rocky Peak here.

A very important wildlife passage between the Santa Susana Mountains and the Simi Hills is just west of the Ventura-Los Angeles County line connecting Corriganville Park and the Runkle Ranch. It is a broad tunnel under the freeway, which enabled the connection of the property that was divided by constructing State Route-118. This tunnel connects dirt roads and trails on either side, and is regularly used by mountain lions and other wildlife.

Most of the SEA from State Route-118 northward is designated critical habitat for the coastal California gnatcatcher (*Polioptila californica californica*), which is a diminutive bird that is becoming rare due to loss of its preferred habitat, which is coastal sage scrub. The critical habitat for this bird extends across the Ventura-Los Angeles County line along the extent of the Santa Susana Mountains into Ventura County.

North of State Route-118, the SEA excludes development in the area of Hialeah Springs (but includes the springs), and circles round the development to include the more sparse settlement in the Deer Lake Highlands area. The SEA boundary goes north along the watercourse of Browns Canyon to the confluence with Mormon Canyon. Here the SEA boundary climbs the ridgeline that separate Browns Canyon and Mormon Canyon to include Browns Canyon and the Michael D. Antonovich Regional Park at Joughin Ranch, and exclude the Mormon Canyon. Continuing up the ridge to its origin on the crest of Oat Mountain, the SEA boundary turns eastward along the ridgeline, excluding the oil fields in the upper reaches of Mormon Canyon and including the extensive natural areas of the north slope of the Santa Susana Mountains.

Along the Ventura-Los Angeles County line north of Rocky Peak, the SEA boundary crosses Blind Canyon (draining to San Fernando Valley), then Llajas Canyon (draining to Simi Valley and ultimately Mugu Lagoon), then El Toro and Chivo canyons (also draining to Mugu Lagoon). Northwest of Chivo, the crest of the Santa Susana Mountains is crossed, and drainages are tributaries of Salt Canyon and the Santa Clara River. The north edge of the critical habitat for the coastal California gnatcatcher is crossed near the crest, where the south-facing slopes that favor coastal sage scrub give way to the ridgeline and north-facing slopes that promote denser chaparral and oak woodlands. At the northern boundary of the SEA, the Santa Clara River SEA is contiguous as is the critical habitat for the state and federally-endangered least Bell's vireo (*Vireo bellii pusillus)*, which is a small bird that usually nests next to perennial water.

From the northwesterly corner, the boundary travels east along the north side of Salt Canyon, and then along the northern side of the Salt Canyon East Fork. Where the East Fork turns south, the SEA boundary continues east to encompass the steeper southern areas along Potrero Canyon and all of the Pico Canyon drainage south of Potrero. The SEA boundary is truncated at the Stevenson Ranch development, including the Wickham Canyon tributary of Pico in the SEA, but excluding most of Dewitt Canyon. This boundary of the SEA is essentially following the northern edge of the Salt Creek open space that was approved with the Newhall Ranch Specific Plan. In the vicinity of Pico Canyon, the boundary continues eastward to encompass the Lyon Canyon watershed and an unnamed watershed just north of Lyon up to the west side of Interstate-5. Along Interstate-5, the SEA boundary continues along the line of natural vegetation (west and southwest side of Gavin Canyon) including the watersheds of tributaries Towsley, Wiley, Leaming, Rice, and East canyons. The boundary continues east along the western edge of Interstate-5 to an area just west of the Angeles City line, near the interchange with State Route-14. Here the boundary excludes the drainage of Sunshine Canyon, which is involved in the Sunshine Canyon Landfill used by both the City of Los Angeles and the County. Critical habitat for the coastal California gnatcatcher is the watersheds of Towsley, Wiley, Rice, and East canyons south of the Interstate-5 below about the

2400 feet elevation contour.

North across the Interstate-5 is the Newhall Wedge. The Newhall Wedge is a very rugged part of the Santa Susana Mountains, with substantial natural vegetation of oak woodlands, chaparral, and coastal sage scrub. The Newhall Wedge is truncated by the flood plains of tributaries of the South Fork of the Santa Clara River to the north, east and west, and these flood plains have had extensive development as the City of Santa Clarita. (Gavin Canyon is one of these tributaries.) Important connective areas are the road crossings of the Interstate-5 and State Route-14. The connection to the Santa Clara River SEA is the Los Pinetos Road underpass of the State Route-14. Consistent wildlife movement has been recorded with motion-activated cameras there. The Weldon Canyon Road overpass of the Interstate-5 is another connection for the Newhall Wedge with the main part of the SEA. The Old Road underpass of the Interstate-5 is a broad connection. The Calgrove underpass is another broad connection, but busy with traffic. Natural areas are adjacent to all these under- and overpasses. The South Fork of the Santa Clara River is formed by the junction of Towsley, Wiley and East canyons in the northeast corner of Michael D. Antonovich Open Space. Its underpass of Interstate-5 has a natural bottom that is used frequently by wildlife, but on the east side of Interstate-5 there is a series of 15 feet drops and channeled sides, which is unlikely that terrestrially-tied wildlife would continue into the populated parts of the City of Santa Clarita along the South Fork. Critical habitat for the coastal California gnatcatcher is in most of the Newhall Wedge part of the SEA between the Interstate-5 and the Sierra Highway that is just west of State Route-14.

On the west side of Sunshine Canyon, a broad lobe of the SEA extends along the ridgeline, which separates Sunshine and Bee Canyon to include Bee Canyon Park and Mission Point of O'Melveny Park. This is an area with walnut woodlands, oak woodlands, grasslands, and chaparral including coastal sage scrub, which is the diverse and green vegetation typical of the Santa Susana Mountains. Critical habitat for the coastal California gnatcatcher covers O'Melveny Park, except for the ridgeline of Mission Point, which is above the 2400 feet contour. The SEA boundary travels west from Mission Point along the ridgeline above the Aliso Canyon Oil Field and turns south at the western edge of the Aliso Canyon Oil Field, along the ridgeline between Mormon and Browns canyons. Critical habitat for the coastal California gnatcatcher extends below about the 2400 feet contour (including Mormon and Browns canyons) and roughly is within the SEA north of State Route-118.

The SEA includes a variety of topographic features; the northern portion of the SEA encompasses Oat Mountain and much of the Santa Susana Mountains from the Ventura-Los Angeles County line east to Interstate-5. Portions of many of the canyons associated with the Santa Susana Mountains and Oat Mountain are also included, such as Salt Canyon, Potrero Canyon, Pico Canyon, Towsley Canyon, El Toro Canyon, Sulphur Canyon, Devil Canyon, Ybarra Canyon, Browns Canyon, Bee Canyon, and Mormon Canyon. Several perennial stream areas occur within these canyons, and there are many natural springs. The north slopes of the Santa Susana Mountains are within the Santa Clara River watershed, which drains the Los Padres National Forest to the north, the Angeles National Forest to the northeast and east, and the Santa Susana Mountains to the south and southeast. The remainder of the SEA is within the Los Angeles River watershed. The majority of the land in the SEA is natural open space with very sparse disturbances in the form of ranches, oil wells, and unimproved access roads. The SEA consists of east-west and northwest trending primary ridges and north-south trending secondary ridges.

The peak of Oat Mountain represents the highest point in the SEA at 3,747 feet above mean sea level (MSL). From Oat Mountain, one can appreciate the diverse influences that create extremely diverse habitat within this SEA. One can see downstream along the Santa Clara River to the mouth of the Pacific Ocean and to the northern Channel Islands. Across the San Fernando Valley are the Santa Monica Mountains, and the Simi Hills enclose the west end of the Valley. To the east are the ascending ridges of the San Gabriel Mountains, and to the northeast the Santa Clara River continues upstream towards the Antelope Valley and the Mojave Desert. Coastal, valley, montane,

and desert influences all meet within this small mountain range.

Open space within the SEA supports this great variety of communities, but is dominated by chaparral, oak woodlands, coastal sage scrub, bigcone Douglas-fir-canyon oak woodland, and grasslands; however, there are numerous examples of special vegetation. Not uncommon are cherry woodlands, which are dominated by holly leaf cherry (Prunus ilicifolia). These mountains are a meeting area of the (regular) Douglas fir (*Pseudotsuga menziesii*) and the bigcone Douglas-fir (*Pseudotsuga macrocarpa*). There are a number of special endemic plants, such as the Santa Susana tarweed (*Deinandra minthornii*), which is a tarplant like few others since it is perennial. Its distribution spreads through the Simi Hills and into the Santa Monica Mountains, but it is primarily at home among the sandstone boulders and terraces, which prevail in the Santa Susana Mountains. The Santa Susana Mountains are the only known place in the County with members of the uncommon Palmer's oak (*Quercus palmeri).* This desert oak can be very long-lived. A clone found in Riverside County was judged to have started from an acorn in the last Ice Age, over 10,000 years ago. Other oaks with groves in the Santa Susanas include coast live oak (*Quercus agrifolia*), valley oak (*Q. lobata*), canyon live oak (*Q. chrysolepis*), scrub oak (*Quercus berberidifolia*), and interior live oak (*Q. wislezenii*). The numerous creeks and canyons support riparian scrub and woodland communities with oaks, sycamores, and willows. There are walnut woodlands of the California black walnut (*Juglans californica*) mixed with flowering ash (*Fraxinus dipetala*) and Mexican elderberry (*Sambucus mexicana*) and coast live oak. Flowering ash may be a tree up to 60 feet tall in the Santa Susana Mountains, whereas it usually is a low tree or even spindly shrub. The woodlands dominated by walnuts and flowering ash appear to be unique to the Santa Susana Mountains. The bigcone Douglas-fir-canyon live oak forest at higher elevations represents one of the northwesternmost examples of this community. At its southern end, the SEA includes the eastern portion of the Simi Hills, including the east-facing slopes descending from Chatsworth Peak. Chatsworth Reservoir forms a portion of the south boundary and is currently dry, except for a small detention basin north of the reservoir.

Chatsworth Reservoir is now dry and is a superfund clean-up site due to the dumping of chemicals from a rocket facility that used to be in the Simi Hills. However, it has a variety of very interesting habitat with several protected avian communities of songbirds and geese, which makes it valuable for bird study by students, researchers, and naturalists. There is a perennial pond at the north end that supports freshwater marsh, which is an extremely scarce habitat in the County and Southern California. This pond is on the Pacific Flyway, and supports numerous kinds of waterfowl during the spring and fall migration periods, especially because of the adjacent grasslands. The periphery of the reservoir is savannah, with a mixture of valley and coast live oaks (*Quercus lobata* and *Q. agrifolia*), some in small stands.

The majority of the SEA is within the unincorporated area of the County.

Vegetation

The plant communities within the SEA are composed of numerous plant species. These plant species are adapted to a Mediterranean climate with a cool, wet season followed by a hot, dry season. Due to the topographic complexity and coastal and desert influences, the SEA supports a wide diversity of plant species.

Plant species observed or recorded in previous documentation within the SEA are indicated in the *Comprehensive Floral & Faunal Compendium of the Los Angeles County SEAs.* Sensitive plant species occurring or potentially occurring within the SEA are discussed in the Sensitive Biological Resources section.

Descriptions and general locations of each plant community present within the SEA are given below. These include chaparral, coastal sage scrub, alluvial scrub, coast live oak woodlands, valley oak

woodland, mainland cherry forest, non-native grassland, native grassland, southern willow scrub, southern cottonwood-willow riparian forest, and disturbed communities.

Chaparral: Consists of a broad mix of evergreen species and generally occurs below 5,000 feet in Southern California. Dominant species consist of broad-leaved or needle-leafed sclerophyllous (hard-leafed) shrubs, forming a dense, impenetrable cover with little or no understory growth. The understory typically consists of considerable accumulation of leaf litter. In areas of less dense shrub cover, the understory consists of non-native grasses and other annual forbs. Dominant species include chamise, laurel sumac (*Malosma laurina*), hoary-leaf ceanothus (*Ceanothus crassifolius*), chapparal whitethorn (*Ceanothus leucodermis*), and toyon (*Heteromeles arbutifolia*). Chaparral is the dominant plant community within the SEA and covers many of the steep slopes and hillsides in the upper elevations.

Corresponding MCV communities:

- *Adenostoma fasciculatum* (chamise chaparral) Shrubland Alliance
- *Adenostoma fasciculatum-Salvia apiana* (chamise-white sage chaparral) Shrubland Alliance
- *Arctostaphylos glauca* (bigberry manzanita chaparral) Shrubland Alliance
- *Ceanothus crassifolius* (hoary leaf ceanothus chaparral) Shrubland Alliance
- *Ceanothus leucodermis* (chaparral whitethorn) Shrubland Alliance
- *Ceanothus megacarpus* (big pod ceanothus chaparral) Shrubland Alliance
- *Ceanothus spinosus* (greenbark ceanothus chaparral) Shrubland Alliance
- *Ceanothus oliganthus* (hairy leaf ceanothus chaparral) Shrubland Alliance
- *Prunus ilicifolia* (holly leaf cherry chaparral) Shrubland Alliance
- *Rhus ovata* (sugarbush chaparral) Shrubland Alliance

Coastal Sage Scrub Communities: Consist of drought-deciduous, low, soft-leaved shrubs and herbs on gentle to steep slopes below 3,000 feet in elevation. Several dominant species may occur within scrub communities, with some areas overwhelmingly dominated by one or two species. California sagebrush (*Artemisia tridentata*), California buckwheat (*Eriogonum fasciculatum*), California brittle bush (*Encelia californica*), purple sage (*Salvia leucophylla*), and deerweed (*Acmispon glaber*). Coastal sage scrub is found at the lower elevations within the SEA on drier south-facing slopes, but can also be found on the north-facing slopes and canyon of the Santa Susana Mountains.

Corresponding MCV communities:

- *Artemisia californica* (California sagebrush scrub) Shrubland Alliance
- *Artemisia californica-Salvia mellifera* (California sagebrush-black sage scrub) Shrubland Alliance
- *Artemisia californica-Eriogonum fasciculatum* (California sagebrush-California buckwheat scrub) Shrubland Alliance
- *Encelia californica* (California brittle bush scrub) Shrubland Alliance
- *Dendromecon rigida* (bush poppy scrub) Shrubland Alliance
- *Isocoma menziesii* (Menzie's golden bush scrub) Shrubland Alliance
- *Salvia apiana* (white sage scrub) Shrubland Alliance
- *Salvia leucophylla* (purple sage scrub) Shrubland Alliance
- *Salvia mellifera* (black sage scrub) Shrubland Alliance
- *Eriogonum cinereum* (ashy buckwheat scrub) Shrubland Alliance
- *Eriogonum fasciculatum* (California buckwheat scrub) Shrubland Alliance
- *Ericameria linearifolia* (narrowleaf goldenbush scrub) Provisional Shrubland Alliance
- *Hazardia squarrosa* (sawtooth golden bush scrub) Shrubland Alliance
- *Lotus scoparius* ([*Acmispon glaber*] deer weed scrub) Shrubland Alliance

- *Lupinus albifrons* (silver bush lupine scrub) Shrubland Alliance
- *Malacothamnus fasciculatus* (bush mallow scrub) Shrubland Alliance

Alluvial Scrub: Consists of a mixture of shrubs that colonize sandy-gravelly flood deposited soils within intermittent creeks, arroyos, and drier terraces in large washes. This community intergrades with sage scrub communities and riparian communities and, therefore, occurs adjacent to these communities. Great basin sagebrush (*Artemisia tridentata*), scalebroom (*Lepidospartum squamatum*), quail bush (*Atriplex lentiformis*), and skunk bush (*Rhus aromatica*). Alluvial scrub is predominantly found at the northern end of the SEA in Salt Canyon.

Corresponding MCV communities:

- *Artemisia californica-Eriogonum fasciculatum* (California sagebrush-California buckwheat scrub) Shrubland Alliance
- *Lepidospartum squamatum* (scalebroom scrub) Shrubland Alliance
- *Malosma laurina* (laurel sumac scrub) Shrubland Alliance

Coast Live Oak Woodlands: Commonly occur along drainages that experience at least a seasonal flow or in other areas under mesic conditions. Soil structure and soil moisture are the most important limiting factors for the survival of oak woodlands; soils must be deep, uncompacted, fertile, well-aerated, and well-drained. This community is dominated by coast live oak. If sufficient groundwater is present, western sycamore (*Platanus racemosa*), which is usually associated with riparian habitats, may also occur in the oak woodland. Oak woodlands occupy areas within the canyons and drainages of the SEA.

Corresponding MCV communities:

- *Quercus agrifolia* (coast live oak woodland) Woodland Alliance

Valley Oak Woodland: An open-canopy woodland found on deep, well-drained alluvial soils below 2,000 feet. This community is almost exclusively dominated by valley oak (*Quercus* lobata) with a grassy understory to form a savannah-like community. This community is located in small pockets in the eastern portion of the SEA.

Corresponding MCV communities:

- *Quercus lobata* (valley oak woodland) Woodland Alliance

Mainland Cherry Forest: Not well described, but is typically composed of tall stands of holly leaf cherry (*Prunus ilicifolia*) on rocky, dry, north-facing slopes. Within the SEA, coast live oak is co-dominant within this community and can be found in canyons in the northern portion of the SEA. This community can also be found in association with alluvial scrub in the northwestern portion of the SEA as it approaches the Santa Clara River.

Corresponding MCV communities:

- *Prunus ilicifolia* (Holly leaf cherry chaparral) Shrubland Alliance

Grassland Communities: Consist of low, herbaceous vegetation that are dominated by grasses but generally also harbor native forbs and bulbs, as well as naturalized annual forbs. Topographic factors that contribute to grassland presence include gradual slopes or flat areas with deep, well-developed soils in areas below 3,000 above MSL. The species richness of grassland communities is dependent upon a number of land use factors, including intensity and duration of natural or anthropogenic disturbances, such as grazing. Heavily grazed grasslands have a lower species

richness.

Native grassland is often associated with coastal sage scrub and is found in pockets in close proximity to coastal sage scrub and non-native grassland. This community consists of at least 10 percent relative cover of native herbaceous plants (grasses and forbs). The remaining vegetative cover is made up of non-native grasses found in annual grassland and a variety of annual, showy flowers, such as golden stars (*Bloomeria crocea*) and blue-eyed grass (*Sisyrinchium bellum*). Small patches of native grassland can be found scattered throughout the SEA mostly in openings in coastal sage scrub and mixed with non-native grasslands.

Corresponding MCV communities:

- *Leymus condensatus* (giant wild rye grassland) Herbaceous Alliance
- *Nassella cernua* ([*Stipa cernua*] nodding needle grass grassland) Provisional Herbaceous Alliance
- *Nassella lepida* ([*Stipa lepida*] foothill needle grass grassland) Provisional Herbaceous Alliance
- *Nassella pulchra* ([*Stipa pulchra*] purple needle grass grassland) Herbaceous Alliance

Non-native grassland consists of dominant invasive annual grasses that are primarily of Mediterranean origin. Dominant species found within this community include slender wild oat (*Avena barbata*), wild oat (*A. fatua*), ripgut brome (*Bromus diandrus*), and red brome (*B. madritensis* ssp. *rubens*).

Corresponding MCV communities:

- *Avena (barbata, fatua)* (Wild oats grasslands) Semi-Natural Herbaceous Stands
- *Brassica (nigra) and other mustards* (Upland mustards) Semi-Natural Herbaceous Stands
- *Bromus (diandrus,hordeaceus)-Brachypodium distachyon* (Annual brome grasslands) Semi-Natural Herbaceous Stands
- *Bromus rubens-Schismus (arabicus, barbatus)* ([*Bromus madritensis* ssp. *rubens*] Red brome or Mediterranean grass grasslands) Semi-Natural Herbaceous Stands
- *Centaurea (solstitialis, melitensis)* (Yellow star-thistle fields) Semi-Natural Herbaceous Stands
- *Lolium perenne* ([*Festuca perennis*] perennial rye grass fields) Semi-Natural Herbaceous Stands

<u>Southern Willow Scrub</u>: A riparian community occurring within and adjacent to watercourses. The vegetation within this community is adapted to seasonal flooding. Southern willow scrub is characterized by dense, broad leafed, winter-deciduous riparian thickets dominated by one or more willow species (*Salix* spp.) Most stands are too dense to allow understory development. The dominant species of this community within the SEA are arroyo willow (*Salix lasiolepis*), and red willow (*S. laevigata*), with less common associates such as mulefat (*Baccharis salicifolia*). This community occurs in segments along portions of the intermittent drainages within the SEA.

Corresponding MCV communities:

- *Salix exigua* (Sandbar willow thickets) Shrubland Alliance
- *Salix lasiolepis* (Arroyo willow thickets) Shrubland Alliance

<u>Southern Cottonwood-Willow Riparian Forest</u>: Consists of an open, broad-leaved, winter-deciduous riparian forest dominated by Fremont cottonwood (*Populus fremontii*), black cottonwood (*P. trichocarpa*), and several willow species, including arroyo willow and red willow. This community occupies much of the Santa Clara River adjacent to the northern boundary of the SEA, and also occurs within the larger, intermittent and perennial drainages within the SEA.

Corresponding MCV communities:

- *Populus fremontii* (fremont cottonwood forest) Forest Alliance
- *Populus trichocarpa* (black cottonwood forest) Forest Alliance

Disturbed or Barren Areas: Areas that either completely lack vegetation or are dominated by ruderal species. Ruderal vegetation typically found onsite include non-native grasses and a high proportion of weedy species, including tocalote, telegraph weed, tree tobacco, doveweed, black mustard, and thistle species. Several disturbed areas occur scattered throughout the SEA and take the form of residential developments, highways, fire breaks, dirt access roads, trails, transmission poles, and other similarly disturbed areas.

Corresponding MCV communities:

No corresponding communities at this time

Wildlife

Wildlife within the SEA is generally diverse and abundant due to the large acreage of natural open space and the diversity of habitat types. While a few wildlife species are entirely dependent on a single vegetative community, the entire mosaic of all the vegetation communities within the SEA and adjoining areas constitutes a functional ecosystem for a variety of wildlife species; this applies to the SEA and the regional ecosystem.

The analysis of invertebrates in this study is difficult due to the lack of data, although limited studies have been conducted. The SEA is believed to support healthy populations of a diverse assortment of countless invertebrate species. Amphibian populations are generally restricted in semi-arid and arid habitats but may be particularly abundant where riparian areas occur. The SEA is likely to support a variety of amphibians in abundance within wetland areas along the major canyon bottoms and the moister oak woodland areas. Many essential reptilian habitat characteristics, such as open habitats that allow free movement and high visibility, and small mammal burrows for cover and escape from predators and extreme weather, are present within the SEA. These characteristics, as well as the variety of habitat types present, are likely to support a wide variety of reptilian species.

The scrubland, woodland, riparian, and grassland habitats in the SEA provide foraging and cover habitat for year-round residents, seasonal residents, and migrating song birds. In addition, the SEA encompasses many year-round water sources, abundant raptor foraging, perching, and nesting habitat. The combination of these resources, as well as the mosaic of many community types, provide for an unusually high diversity of bird species. Several of these species may use this SEA as their only consistent occurrence in the southeastern portion of the County.

Mammal populations within the SEA are diverse and reflective of the diversity of habitat types. Unlike many other inland hills within the Los Angeles Basin, this SEA is large enough to support relatively stable and large mammal populations despite the urban surroundings; even the large carnivores, including the black bear and mountain lion, are known from the SEA. This indicates the presence of intact food chains and complete communities that have a complex, resilient food web.

All wildlife species previously recorded, as well as those expected to occur, within the SEA are indicated in the *Comprehensive Floral & Faunal Compendium* of the *Los Angeles County SEAs*. Sensitive wildlife species occurring or potentially occurring within the SEA are discussed in the Sensitive Biological Resources section.

Wildlife Movement

The SEA includes several important linkages for wildlife movement. The Simi Hills and Santa Susana Mountains provide a vast open space corridor to foster wildlife movement between the

Santa Monica Mountains to the south, San Gabriel Mountains to the east, and Los Padres National Forest to the north in the western San Gabriel Mountains of the Transverse Ranges. Dense, natural habitat associated with the majority of the SEA provides excellent opportunities for concealment and water sources, while the grasslands provide an abundance of prey. Examples of wildlife that use these linkages include mountain lion (*Puma concolor*), mule deer (*Odocoileus hemionus*), coyote (*Canis latrans*), bobcat (*Lynx rufus*), and a number of medium-sized animals.

Sensitive Biological Resources

Sensitive biological resources are habitats or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, and/or rare. This is due to the species' declining or limited population sizes, which usually results from habitat loss. Watch lists of such resources are maintained by the California Department of Fish and Game (CDFG), the United States Fish and Wildlife Service (USFWS), and special groups, such as the California Native Plant Society (CNPS). The following sections indicate the habitats as well as plant and animal species present, or potentially present within the SEA, which have been accorded special recognition. When species are federally-listed as endangered or threatened, they often have federally-designated, geographically-specific "critical habitat areas." Critical habitat areas, after extensive study by experts, are judged to be essential to conservation and maintenance of the species. Critical habitats for the Braunton's milkvetch and coastal California gnatcatcher are described in the General Boundary and Resources Description section.

Sensitive Plan Communities and Habitats

The SEA supports several habitat types considered sensitive by resource agencies. These are inventoried by California Department of Fish and Game (CDFG) in the California Natural Diversity Database (CNDDB) [2011]. The CNDDB includes state and federally-listed endangered, threatened, and rare vascular plants, as well as several sensitive vertebrate species. These communities include chamise-white sage chaparral, holly leaf cherry chaparral, California brittle bush scrub, white sage scrub, narrowleaf goldenbush scrub, sawtooth golden bush scrub, scalebroom scrub, valley oak woodland, holly leaf cherry chaparral, giant wild rye grassland, nodding needle grass grassland, foothill needle grass grassland, purple needle grass grassland, Fremont cottonwood forest, and black cottonwood forest, which occur throughout the SEA. These communities, or closely related designations, are considered high priority communities by the CDFG, which indicates that they are experiencing a decline throughout their range. The array and composition of these communities has been discussed in the Vegetation section.

Sensitive Plant Species

The statuses of rare plants are hierarchically categorized by the CNPS using a rank and decimal system. The initial category level of Rare Plant Rank is indicated by the ranks 1A (presumed extinct in California), 1B (rare or endangered in California and elsewhere), 2 (rare or endangered in California but more common elsewhere), 3 (more information needed, a review list), and 4 (limited distribution). In cases where the CNPS has further identified the specific threat to the species, a decimal or Threat Code is added: .1 (seriously endangered in California), .2 (fairly endangered in California), or .3 (not very endangered in California).

The following special-status plant taxa have been reported or have the potential to occur within the SEA, based on known habitat requirements and geographic range information:

- Norris' beard moss (*Didymodon norrisii*) RPR 2.2
- Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*) RPR 2.2
- Braunton's milk-vetch (*Astragalus brauntonii*) FE, RPR 1B.1
- Nevin's barberry (*Berberis nevinii*) FE, SE, RPR 1B.1

- Round-leaved filaree (*California macrophylla*) RPR 1B.1
- Peirson's morning-glory (*Calystegia peirsonii*) RPR 4.2
- Southern tarplant (*Centromadia parryi* ssp. *australis*) RPR 1B.1
- San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*) FC, SE, RPR 1B.1
- Santa Susana tarplant (*Deinandra minthornii*) Rare, RPR 1B.2
- San Gabriel bedstraw (*Galium grande*) RPR 1B.2
- Palmer's grapplinghook (*Harpagonella palmeri*) RPR 4.2
- Newhall sunflower (*Helianthus inexpectatus*) RPR 1B.1
- Los Angeles sunflower (*Helianthus nuttallii* ssp. *parishii*) RPR 1A
- Mesa horkelia (*Horkelia cuneata* ssp. *puberula*) RPR 1B.1
- Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*) RPR 1B.1
- Davidson's bushmallow (*Malacothamnus davidsonii*) RPR 1B.2
- Mud nama (*Nama stenocarpum*) RPR 2.2
- Moran's navarretia (*Navarretia fossalis*) FT, RPR 1B.1
- Ojai navarretia (*Navarretia ojaiensis*) RPR 1B.1
- White rabbit-tobacco (*Pseudognaphalium leucocephalum*) RPR 2.2
- Chaparral ragwort (*Senecio aphanactis*) RPR 2.2
- Greata's aster (*Symphyotrichum greatae*) RPR 1B.3
- Slender mariposa lily (*Calochortus clavatus* var. *gracilis*) RPR 1B.2
- Late-flowered mariposa lily (*Calochortus fimbriatus*) RPR 1B.2
- Plummer's mariposa lily (*Calochortus plummerae*) RPR 1B.2
- Chaparral nolina (*Nolina cismontana*) RPR 1B.2
- California Orcutt grass (*Orcuttia californica*) FE, SE, RPR 1B.1

Sensitive Animal Species

The following vertebrate species are state and/or federally-listed as endangered or threatened, and have the potential to occur in the SEA:

- Riverside fairy shrimp (*Streptocephalus woottoni*) FE
- Unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*) FE, FSS, SE, CDFG Fully Protected
- Arroyo toad (*Anaxyrus californicus*) FE, SSC
- California red-legged frog (*Rana draytonii*) FT, SSC
- Sierra Madre yellow-legged frog (*Rana muscosa*) FE, FSS, SSC
- Western spadefoot (*Spea hammondii*) BLMS, SSC
- Silvery legless lizard (*Anniella pulchra pulchra*) FSS, SSC
- Coastal whiptail (*Aspidoscelis tigris stejnegeri*) CDFG Special Animals List
- Rosy boa (*Charina trivirgata*) BLMS, FSS
- San Bernardino ringneck snake (*Diadophis punctatus modestus*) FSS
- Western pond turtle (*Emys marmorata*) BLMS, FSS, SSC
- San Diego mountain kingsnake (*Lampropeltis zonata pulchra*) FSS, SSC
- Coast horned lizard (*Phrynosoma blainvillii*) BLMS, FSS, SSC
- Coast patch-nosed snake (*Salvadora hexalepis virgultea*) SSC
- Two-striped garter snake (*Thamnophis hammondii*) BLMS, FSS, SSC
- Cooper's hawk (nesting) (*Accipiter cooperii*) CDFG Watch List
- Tricolored blackbird (nesting colony) (*Agelaius tricolor*) BCC, BLMS, SSC, USBC, AWL, ABC
- Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) CDFG Watch List

- Grasshopper sparrow (*Ammodramus savannarum*) CDFG Special Animals List
- Bell's sage sparrow (*Amphispiza belli belli*) BCC, CDFG Watch List
- Golden eagle (nesting and wintering) (*Aquila chrysaetos*) BCC, BLMS, CDFG Watch List, CDFG Fully Protected, CDF
- Burrowing owl (burrow sites) (*Athene cunicularia*) BCC, BLMS, SSC
- Western yellow-billed cuckoo (*nesting*) (*Coccyzus americanus occidentalis*) FC, BCC, FSS, SE
- Yellow warbler (nesting) (*Dendroica petechia brewsteri*) SSC
- White-tailed kite (nesting) (*Elanus leucurus*) CDFG Fully Protected
- California horned lark (*Eremophila alpestris actia*) CDFG Watch List, LAA (full species, coastal slope)
- California condor (*Gymnogyps californianus*) FE, SE, CDF, CDFG Fully Protected, USBC, AWL, ABC
- Yellow-breasted chat (nesting) (*Icteria virens*) SSC
- Loggerhead shrike (nesting) (*Lanius ludovicianus*) BCC, SSC, LAA (coastal slope wintering)
- Coastal California gnatcatcher (*Polioptila californica californica*) FT, SSC, USBC, AWL, ABC
- Bank swallow (nesting) (*Riparia riparia*) ST
- Least Bell's vireo (*Vireo bellii pusillus*) FE, BCC, SE, USBC, AWL, ABC
- Pallid bat (*Antrozous pallidus*) FSS, BLMS, SSC, WBWG High
- Spotted bat (*Euderma maculatum*) BLMS, SSC, WBWG High
- Western mastiff bat (*Eumops perotis californicus*) BLMS, SSC, WBWG High
- Silver-haired bat (*Lasionycteris noctivagans*) WBWG Medium
- Western red bat (*Lasiurus blossevilli*) FSS, WBWG High
- Hoary bat (*Lasiurus cinereus*) WBWG Medium
- San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) SSC
- California leaf-nosed bat (*Macrotus californicus*) FSS, SSC, WBWG High
- South coast marsh vole (*Microtus californicus stephensi*) SSC
- Western small-footed myotis (*Myotis ciliolabrum*) BLMS, WBWG Medium
- Yuma myotis (*Myotis yumaensis*) BLMS, WBWG Low–Medium
- San Diego desert woodrat (*Neotoma lepida intermedia*) SSC
- Southern grasshopper mouse (*Onychomys torridus ramona*) SSC
- Los Angeles pocket mouse (*Perognathus longimembris brevinasus*) FSS, SSC
- American badger (*Taxidea taxus*) SSC

Ecological Transition Areas (ETAs)

There are no ETAs designated within this SEA.

Regional Biological Value

The SEA meets several SEA designation criteria and supports many regional biological values. Each criterion and how it is met described below .

CRITERIA ANALYSIS OF THE SANTA SUSANA MOUNTAINS AND SIMI HILLS SEA

	Criterion	Status	Justification
	The habitat of core populations of endangered or threatened		Most of the SEA has critical habitat for the coastal California gnatcatcher. A population of the Braunton's

	Criterion	Status	Justification
A)	plant or animal species.	Met	milkvetch has critical habitat in the Simi Hills part of the SEA. The SEA has robust populations of rare plants, such as the Plummer's mariposa lily and the Santa Susana tarweed.
B)	On a regional basis, biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution.	Met	The SEA contains habitat of the extremely rare Santa Susana tarplant. In addition, several plant communities within the SEA are CDFG highest inventory priority communities due to their restricted distribution in the Southern California region. These communities include: coastal sage scrub, alluvial scrub, valley oak woodland, valley oak savannah, mainland cherry woodland, native grassland, southern willow scrub, and cottonwood-willow riparian forest.
C)	Within the County, biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution.	Met	All of the plant communities and habitats mentioned above as being restricted in distribution on a regional basis are further restricted in distribution within the County.
D)	Habitat that at some point in the life cycle of a species or group of species, serves as concentrated breeding, feeding, resting, or migrating grounds and is limited in availability either regionally or in the County.	Met	The open space of the SEA allows for connectivity between the Santa Monica Mountains and the San Gabriel Mountains (both the eastern and western sections). Due to the development within the San Fernando Valley and the valley of the Santa Clara River, this is an important corridor for gene flow and species movement.
E)	Biotic resources that are of scientific interest because they are either an extreme in physical/geographical limitations, or represent unusual variation in a population or community.	Met	The SEA contains several populations that are unusual or at the extreme ends of their distributions: Douglas-fir, both big cone and the Douglas-fir common to the north, and coastal California gnatcatcher at its western extent. Several unusual vegetation alliances are in the Mountains, for example groves of walnuts and flowering ash. Flowering ash are uncommonly tall. The Santa Susana Mountains contain some representatives of the desert Palmer's oak, which is unusual in the County.
	Areas that would provide for the preservation of relatively		The relatively undisturbed nature and large size of the plant communities within the Santa Susana Mountains

Criterion		Status	Justification
F)	undisturbed examples of the original natural biotic communities in the County.	Met	and Simi Hills provides many undisturbed examples of native, natural communities within the County.

In conclusion, the area is an SEA because it contains: A) core habitats of listed species; B-C) biotic communities, vegetative associations, and habitat of plant and animal species that are restricted in distribution in the County and regionally; D) a very essential migration corridor, which is limited in availability in the County; E) unusual populations at the extreme ends of their distributions that are of scientific interest; and F) areas that provide for the preservation of relatively undisturbed examples of original natural biotic communities in the County.

23. Santa Susana Mountains and Simi Hills SEA Sources

Baldwin, Bruce G., Douglas H. Goldman, David J. Keil, Robert Patterson, and Thomas J. Rosatti (editors, 2012) *The Jepson Manual: Vascular Plants of California, Thoroughly Revised and Expanded.* Second Edition. Jepson Herbarium, Berkeley, CA. 1600 pp., illus.

California Department of Fish and Game, Natural Diversity Database. January 2011. *Special Animals (898 taxa).* 60 pp.

California Department of Fish and Game, Natural Diversity Database. April 2011. *Special Vascular Plants, Bryophytes, and Lichens List.* Quarterly publication. 71 pp.

California Department of Fish and Game, Natural Diversity Database. January 2011. *State and Federally Listed Endangered and Threatened Animals of California.* 13 pp.

County of Los Angeles, Department of Regional Planning. 1993. *Additional Information and Analysis Regarding the Environmental Impact Report for the Sunshine Canyon Landfill Extension*, Los Angeles County, California.

County of Los Angeles, Department of Regional Planning. 2006. *The Santa Susana Mountains- Simi Hills SEA Description,* Los Angeles County, California.

Envicom Corporation. 1992 (revised Feb. 4, 1993). *A Consideration of Wildlife Movements in the Santa Susana Mountains*, Los Angeles County, California.

Guthrie, Daniel A. and B. A. Prigge. 1989 (Jan. 31, 1990). *Emendations I & II of Biological Survey of Case 88551, Housing Development for Tract No. 47329, Unincorporated Area of Chatsworth*, Los Angeles County, California.

Guthrie, Daniel A. and B. A. Prigge. 1989 (revised Dec. 26, 1991). *Biological Survey of Case 88551, Housing Development for Tract No. 47329, Unincorporated Area of Chatsworth,* Los Angeles County, California.

Guthrie, Daniel A. and B. A. Prigge. 1988. *Biological Survey of Case 88312, Christara Motion Picture*

Studio Site, 23747, The Old Road, Unincorporated Area of Newhall, Los Angeles County, California

Henrickson, James, PhD. 1996. *Biological Constraints Analysis Zone Change – Conditional Use Permit 96-113, 22925 Coltrane Avenue, Within SEA No. 20, Santa Susana Mountains*, Los Angeles County, California.

Henrickson, James, PhD., Independent Environmental Consultants. 1992. *Biological Constraints Analysis of Tentative Minor Land Division Map No. 23217, in Buffer Zone of SEA No. 23, Soledad Canyon, Santa Clara River*, Los Angeles County, California.

Holland RF. *Preliminary descriptions of the terrestrial natural communities of California*. 1986 and 1992 Update. California Department of Fish and Game unpublished report.

Impact Sciences, Inc. 1996 (Supplemental Info. Submitted Nov. 2, 1999). *Biota Report, Dahl Property, SEA No. 21, Tentative Parcel Map 23793*, Chatsworth, California.

Impact Sciences, Inc. and RECON. 1994. *Biological Constraints Analysis, Newhall Ranch*, California, Case No. 94087.

Michael Brandman Associates. 1995. *Biological Constraints Analysis for Tentative Parcel Map No. 23793*, Los Angeles County, California.

Michael Brandman Associates. 1989. *Supplemental to Biological Resources Assessment of Indian Wells Estates, Tentative Tract 44327*, Los Angeles County, California.

Michael Brandman Associates. 1988. *Biological Resources Assessment, Woolsey Canyon Project Site, Tentative Tract 45756*, Los Angeles County, California.

Regional Environmental Consultants (RECON) and Impact Sciences. 1995. *Biota Report, Newhall Ranch Specific Plan, Volume I of II, Santa Clara River Valley*, California, Tentative Tract Map 44831.

Regional Environmental Consultants (RECON) and Impact Sciences. 1995. *Biota Report, Newhall Ranch Specific Plan, Volume II of II, Santa Clara River Valley*, California, Tentative Tract Map 44831.

Sawyer, Keeler-Wolf and Evens. 2009. *A Manual of California Vegetation, Second Edition* Sacramento: California Native Plant Society Press

Ultrasystems Engineers & Constructors, Inc. Environmental Services. 1991. *Seatac Report. Tentative Tract No. 43896*, Los Angeles County, California. Dale Poe Development Corporation.

Ultrasystems Engineers & Constructors, Inc. Environmental Services. 1991. *Seatac Report. Supplemental Information. Tentative Tract No. 43896*. Los Angeles County, California. Dale Poe Development Corporation.

Ultrasystems Engineers & Constructors, Inc. Environmental Services. 1991. *Seatac Report. Supplemental Report No. 2. Tentative Tract No. 43896*. Los Angeles County, California. Dale Poe Development Corporation.

Ultrasystems Engineers & Constructors, Inc. Environmental Services. 1990. *Biotic Report for Sunshine Mountain Park, Travel Trailer Park, Santa Clarita Valley*, California.

From: Emma Howard
Sent: Tuesday, February 25, 2014 5:51 PM
To: Carla Bollinger
Cc: mark.osokow; Susan Tae; Carl Nadela
Subject: RE: Correction: SEA Profile: Section 23: Santa Susana Mountains and Simi Hills SEA: Chatsworth Nature Preserve

Hi Carla,

Our biologist is fixing the errors you and Ms. Landis have brought to our attention. The boundary between Mormon Canyon Creek and Browns Canyon Creek appears to be at a sub-watershed level. Many of the SEA boundaries do divide out along watershed and sub watershed boundaries.

Regards,
Emma

Emma Howard
Regional Planner
Community Studies North Section
Department of Regional Planning
http://planning.lacounty.gov/sea
Telephone: 213-974-6476

From: Carla Bollinger
Sent: Tuesday, February 18, 2014 6:50 PM
To: Emma Howard
Cc:
Subject: RE: Correction: SEA Profile: Section 23: Santa Susana Mountains and Simi Hills SEA: Chatsworth Nature Preserve

Emma,

Thank you for acting on the errors-correction we submitted.

After sending our correction, I realized that I made a typo error …
Fringing live-giving fresh water marsh

Should read:

fringing life-giving fresh water marsh

There is another matter in the SEA Profile: Section 23: Attached is a statement about the exclusion of Mormon Canyon in the Santa Susana Mountains. Both Mormon Canyon Creek and Browns Canyon Creek are part of the LA River watershed. We are wondering why the determination to exclude Mormon

Canyon from the SEA at the ridgeline where Mormon Canyon and Browns Canyon separate?

Again, thank you for your help and clarification.

Carla Bollinger and Mark Osokow

MORMON CANYON EXCLUSION FROM SEA 23

PARAGRAPH 4, PAGE 2 OF
(page 276: Draft General Plan 2035: Technical Appendix E)
23. Santa Susana Mountains and Simi Hills SEA
Location
General

North of State Route-118, the SEA excludes development in the area of Hialeah Springs (but includes the springs), and circles round the development to include the more sparse settlement in the Deer Lake Highlands area. The SEA boundary goes north along the watercourse of Browns Canyon to the confluence with Mormon Canyon. Here the SEA boundary climbs the ridgeline that separate Browns Canyon and Mormon Canyon to include Browns Canyon and the Michael D. Antonovich Regional Park at Joughin Ranch, and **exclude the Mormon Canyon**. Continuing up the ridge to its origin on the crest of Oat Mountain, the SEA boundary turns eastward along the ridgeline, **excluding the oil fields in the upper reaches of Mormon Canyon** and including the extensive natural areas of the north slope of the Santa Susana Mountains.

From: Connie Chung
Sent: Wednesday, February 12, 2014 3:21 PM
To: DeGonia, Jarrod; Vizcarra, Edel; Diana Dixon-Davis
Cc: Susan Tae; Emma Howard
Subject: RE: Chats. Nature Preserve mislabeled/ LACO Plan

We will correct the error in the Draft GP before the Regional Planning Commission takes final action, which we anticipate will be in August 2014.

Please let me know if you have further questions!

Connie

From: DeGonia, Jarrod
Sent: Wednesday, February 12, 2014 3:09 PM
To: Vizcarra, Edel; Connie Chung; Diana Dixon-Davis
Cc: Susan Tae; Emma Howard
Subject: RE: Chats. Nature Preserve mislabeled/ LACO Plan

Yes, thank you Connie. Can you please elaborate on what you mean by fixing through the public hearing process?

Jarrod

From: Vizcarra, Edel
Sent: Wednesday, February 12, 2014 2:38 PM
To: Connie Chung; DeGonia, Jarrod; Diana Dixon-Davis
Cc: Susie Tae; Emma Howard
Subject: Re: Chats. Nature Preserve mislabeled/ LACO Plan

Thanks Connie!

From: Connie Chung
Sent: Wednesday, February 12, 2014 2:34 PM
To: Vizcarra, Edel; DeGonia, Jarrod; Diana Dixon-Davis
Cc: Susie Tae; Emma Howard
Subject: RE: Chats. Nature Preserve mislabeled/ LACO Plan

Hi, Edel. We do mention it in the Draft, but it's definitely an error that we will fix through the public hearing process, and we are certainly grateful to everyone for bringing this to our attention. Please let us know if you have further questions or concerns.

Thanks!

Connie

-----Original Message-----
From: Vizcarra, Edel
Sent: Tuesday, February 11, 2014 8:41 PM

To: DeGonia, Jarrod; Diana Dixon-Davis; Connie Chung
Subject: Re: Chats. Nature Preserve mislabeled/ LACO Plan

Connie,

Can you please confirm whether the preserve was identified as a Superfund site in the GPU?

Thank you

From: DeGonia, Jarrod
Sent: Tuesday, February 11, 2014 8:29 PM
To: Diana Dixon-Davis
Cc: DeGonia, Jarrod; Chen, Phillip; Leaf, Fred; Vizcarra, Edel; Diana Dixon-Davis
Subject: Re: Chats. Nature Preserve mislabeled/ LACO Plan

Thank you for the catch and I completely agree Diana.

Edel, the Santa Susana Field Lab has been studied twice by EPA to determine if it is a Superfund qualified site and both times it has been found to not qualify. If Planning has indeed made a determination on its own declaring the area surrounding the Field Lab or Chatsworth Park South will have serious consequences.

There is a huge difference between "cleaning up" to Superfund levels and the area being declared a Superfund site.

Jarrod

Sent from my iPhone

On Feb 11, 2014, at 8:21 PM, "Diana Dixon-Davis"wrote:

Dear Supv. Antonovich,
and Jerrod DeGonia (SFV Field Office Deputy) and Phillip Chen (Health Deputy), Fred leaf (Senior Health Policy), Edel Vizcarra (Planning)

Please see the attached and patched in letter re the Chatsworth Nature Preserve being suddenly labeled as a superfund site.

Diana Dixon-Davis

==========
Diana Dixon-Davis
10832 Andora Ave, Chatsworth CA 91311
11 Feb 2014

Michael Antonovich
Los Angele County Supervisor…
500 West Temple, Room 869….
Los Angeles CA 90012

Dear Supervisor and Staff,
Betsey Landis has discovered a serious error in the LA County General Plan *. I hope that this sudden “redefinition” of the Chatsworth Nature Preserve as a superfund site will be corrected immediately.
The Chatsworth Nature Preserve IS NOT AND NEVER HAS BEEN a superfund site!. The consequences of this mislabeling will mean that the county will potentially become liable for anyone who gets sick and lives near the CNP and wants to sue for damages. There could also be lawsuits over a reduction in adjacent county property values because of this mislabeling.
As you can see from the e-mail ** below , according to Betsey Landis, there is another unexpected consequence that the land can not ever be transferred to the City of Los Angeles (Dept of Recreation and Parks), county, state, or federal government without extensive and very expensive “cleanup” procedures being implemented (characterization studies and then all the CEQA study steps required by DTSC).
Could your staff please deal with this immediately? I await your reply.

Diana Dixon-Davis
10832 Andora Ave
Chatsworth CA 91311
CC: Phillip Chen (Health Deputy), Fred leaf (Senior Health Policy),
Edel Vizcarra (Planning)
*"Chatsworth Reservoir is now dry and is a superfund clean-up site due to the dumping of chemicals from a rocket facility that used to be in the Simi Hills." 2014 Los Angeles County General Plan , Appendix E, Page 250, last paragraph.

**From: Elisabeth Landis
Date: February 8, 2014 at 6:38:49 PM PST
Subject: Re Chatsworth Reservoir Preserve status

What outrages me is that this statement about Chatsworth Preserve being a "superfund cleanup site" is in the final draft of the 2014 Los Angeles County General Plan (Appendix E: SEAs: Santa Susana Mountains and Simi Hills).

If it stays in there for the next twenty years it is going to be impossible to include Chatsworth Preserve in a State Park or National Park or in any government-designated parkland.

We need to ensure that Los Angeles County does not include this error in their final version of the 2014 Los Angeles County General Plan. I'll see if Englander's office knows about this.
Betsey Landis

On Feb 8, 2014, at 5:48 PM, Elisabeth Landis wrote:

I sent in comments on Appendix E: Significant Ecological Areas in the draft Los Angeles County General Plan this past week.
In those comments I questioned why, in the Santa Susana Mountains and Simi Hills SEA, the Chatsworth Reservoir/Preserve was classified as a "superfund cleanup site".

Chatsworth Reservoir/Preserve is an extremely important wildlife linkage with valuable chaparral habitat, valley oak woodlands, wetland habitat and valuable native american sites.

On Thursday, at a meeting on the cleanup of Santa Susana Field Lab, which was identified in the SEA description as the source of the contamination, I spoke to a California Department of Toxic Substance Control (DTSC) staff person about this classification of Chatsworth Reservoir/Preserve as a "superfund cleanup site". She had no knowledge of any such designation.
For your information, DTSC is supervising and leading the cleanup of the Santa Susana Field Lab site. It is not a superfund cleanup site.

I went to the DTSC website to check their database of all cleanups of any kind being done in the Chatsworth Reservoir/Preserve area.

There are NO cleanups listed in the Chatsworth Reservoir or the Chatsworth Preserve area.
The DTSC website database of all cleanups in California is EnviroStor at this website address:
www.envirostor.dtsc.ca.gov/public/<http://www.envirostor.dtsc.ca.gov/public/>

Please correct this extremely incorrect designation of Chatsworth Reservoir/Preserve immediately!
Betsey Landis
Los Angeles / Santa Monica Mountains Chapter California Native Plant Society

<2014.02.11 LET to LACO re CNP-def-Superfund.doc

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

February 3, 2014

VIA ELECTRONIC MAIL ONLY

Emma Howard
Regional Planning Department
County of Los Angeles
320 W. Temple Street, Room 1354
Los Angeles, CA 90012
<ehoward@planning.lacounty.gov>

RE: Significant Ecological Areas Ordinance Update (Draft 4)

Dear Ms. Howard:

The Endangered Habitats League (EHL) is a Southern California regional conservation non-profit dedicated to the preservation and restoration of our region's unique ecosystems and to the accommodation of growth through sustainable planning. EHL has decades of experience helping Southern California counties and cities design and implement development standards that maximize the protection of sensitive biological resources. Based on that experience, we respectfully submit the following suggestions aimed at improving the draft Ordinance setting development standards for areas designated as Significant Ecological Areas (SEAs). Please note that these comments pertain broadly County-wide and are not targeted at any particular location.

The purpose of the SEA Ordinance is to ensure that any approved development is *compatible* with maintaining the biological functions and values of the mapped SEAs over the long term. While the draft Ordinance sets numerical ratios for on-site preservation of resources, it 1) fails to provide sufficient guidance for site design and 2) fails to follow a standard sequence of resource avoidance, minimization and finally compensation.

Under the proposed Development Standards, the table of ratios allows certain fractions of specified habitat types to be developed and requires a corresponding fraction of the property to be set aside, sometimes in a contiguous manner, as Habitat Preservation Areas[1]. However, there is no requirement that what is either lost of set aside be in the "right" location. Such an outcome–which is essential to the preservation of SEA

[1] When determining the land base for application of the ratios, it would make sense to consider the unique and exceptional circumstance of the Tejon Ranch Land-Use and Conservation Agreement, which protects land that is contiguous though on the other side of a jurisdictional boundary.

biological functions and values—requires the application of the basic principles of conservation biology through a site design process as described below.

For site design, the Ordinance should put in place a process to determine where land can be lost to development as individual projects are considered. After site-specific surveys and after determining the context of the site within the rest of the SEA and region, a "biological constraints analysis" should guide site design. Constrained areas will include sensitive habitats and species locations as well as lands with the highest ecological integrity—those that are largest, more contiguous, and less fragmented—and those that serve connectivity functions. An exception is that in the case of narrow endemic species, such locations may need protection wherever they occur. Site design simultaneously identifies *least* sensitive locations for development[2].

The premise is that if lands of lower value—due to fragmentation, edge effects, and prior disturbance—are lost but higher value, more contiguous blocks of land are protected, the biological values and ecological processes of the SEAs can be retained even if some development occurs. These are fundamental and accepted principles of preserve design. A corresponding protocol for site design should be added to the Ordinance (examples will be provided later in this letter).

Regarding avoidance of resources, the Ordinance errs in jumping to compensation for habitat loss absent prior consideration of avoidance and minimization. As written, the draft ordinance would allow loss of *predetermined* percentages of habitat (per the ratios) even where it is feasible to *reduce* such loss and still achieve planning objectives. Accordingly, the Development Standards represented by the ratios must be explicitly recognized as a maximum permissible loss rather than the norm. When it is *infeasible* to completely avoid constrained resource—for reasons of economics or planning—the steps of impact minimization and compensation come into play.

Typical means to achieve avoidance are consolidation of development, clustering on smaller lots, density transfers, purchases and bonuses, etc. Such maximum feasible avoidance is inherent in the CEQA process and certainly inherent to the County's "police power" goal of furthering community health and welfare by protecting SEA resources. If underlying land use designations are appropriate for SEAs, achieving more than the minimum conservation under the ratios should often be achievable, and such protection should be required *by the ordinance* irrespective of mitigation ratios.

The *only* way to avert conflicts between land use and SEA protection is to ensure that General Plan land use designations and densities within SEAs reflect SEA biological constraints and support successful Ordinance compliance. The General Plan Update underway thus represents a crucial and imperative opportunity to achieve compatible land use. Similarly, applicants considering GPAs should understand in advance that any

---

[2] In the rare case where a landowner has committed to dedicate lands of high resource value adjacent to SEAs but not in them solely by virtue of jurisdictional boundaries, site design, impact evaluation, and compensation opportunities should consider those lands as a biological unit.

proposed amendment must not pose irreconcilable conflicts with the SEA Development Standards[3].

Also, the "catastrophic findings" for SEA viability contained in Draft 4[4] are so extreme that loss of essential biological functions and values would occur far before these findings were made. Regarding the standards for connectivity, absent consideration of topography, vegetative cover, target species, etc., there is no way to know if the proposed widths of 1000 feet and 200 feet are adequate.

The lack of any provisions in the draft ordinance requiring feasible avoidance and minimization of impacts to biologically significant resources in SEAs also cannot be squared with the County's new General Plan update. Policy C/NR 3.9 provides:

> "Consider the following *in the design of a project* that is located within an SEA, *to the greatest extent feasible*:
>
> - Preservation of biologically valuable habitats, species, wildlife corridors and linkages;
> - Protection of sensitive resources on the site within open space;
> - Protection of water sources from hydromodification to maintain the ecological function of riparian habitats; and
> - Placement of the development in the least biologically sensitive areas on the site.
> - Watershed sensitivity by capturing, treating, retaining, and/or infiltrating storm water flows on site." (Emphases added.)

This Policy unambiguously requires efforts to protect and preserve SEA resources through project design "to the greatest extent feasible." Defaulting to an arbitrary set of ratios, as does the draft ordinance, even when further avoidance and minimization is feasible, fails to implement the heart of this policy.

The draft Ordinance also proposes to *exempt* specific plans, creating an enormous loophole that would render its protections moot for the majority of large development projects. We do not understand how SEAs can be protected with this exemption in place.

---

[3] When determining the compatibility of a proposed GPA with an affected SEA, it would make sense to consider the unique and exceptional circumstance of the Tejon Ranch Land-Use and Conservation Agreement, which in effect clusters development on a larger scale, albeit with some of the resulting ecological benefit occurring on the other side of a jurisdictional boundary.

[4] "Bisection of the SEA; b. Closing of a connectivity or constriction area depicted on the SEA Connectivity and Constriction Areas Map; c. Removal of the entirety of a habitat characteristic of the SEA and described in the SEA's description provided in the General Plan; d. Removal of habitat that is the only known location of a SEA species described in the SEA's description provided in the General Plan; or e. Removal of habitat that is the only known location of a new or rediscovered species."

The concepts outlined above have been implemented by other jurisdictions. Examples are San Diego County's Resource Protection Ordinance (RPO)[5] and Biological Mitigation Ordinance (BMO)[6], which supplements the former in areas covered by the Multiple Species Conservation Program, or MSCP. These ordinances have been in place for decades (though RPO is not up to date in its categorization of sensitive resources). These successful ordinances—and the findings they require—emphasize avoidance and minimization of impacts over mitigation, and thus constitute a real-world demonstration that the mandate contained in C/NR 3.9 can be successfully implemented. Consistent application is achieved through the detailed findings San Diego County has made on each project since 1996 to ensure BMO and MSCP conformance[7]. In addition, San Diego County's Guidelines for Determining Significance for Biological Resources[8] provides detailed guidance for *site design* and the setting aside of proper on-site open space, and links the entire process back to CEQA compliance. A remarkable "clustering" program called the Conservation Subdivision Program (CSP)[9], also implemented through ordinance, facilitates all these goals. We would be happy to discuss with you how ordinances have performed and also to refer you to San Diego County planning staff who are expert in their application.

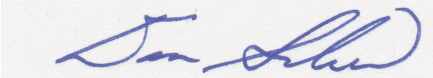
As touched upon above, the approach contained in these ordinances dovetails with the California Environmental Quality Act's independent mandate to adopt feasible project design that avoid or substantially lessen significant environmental impacts (such as destruction of SEA resources). CEQA outright prohibits the City from approving projects with significant environmental effects if there are feasible alternatives or mitigation measures that can "avoid or substantially lessen" those effects. (Pub. Resources Code § 21002.) Unlike the draft SEA ordinance's metric-based approach, the process employed by the San Diego County resource protection ordinances can be used to make the findings CEQA independently requires that significant impacts to biological resources have been avoided or minimized to the maximum extent feasible. The result is a unified approval process that provides project streamlining for applicants.

Thank you for your consideration of EHL's views on this critically important effort. We view this as the beginning of a dialogue and invite further discussion of the concepts outlined in this letter.

---

[5] For RPO, see Sensitive Habitat Lands sections of <http://www.sdcounty.ca.gov/pds/docs/res_prot_ord.pdf>.
[6] For BMO, see <http://www.sdcounty.ca.gov/pds/mscp/bmo.html>.
[7] For Findings of Conformance, see <http://www.sdcounty.ca.gov/pds/regulatory/docs/MSCP_Findings.pdf>.
[8] For Biological Guidelines see section on Standard Mitigation Measures and Project Design Considerations at <http://www.sdcounty.ca.gov/pds/docs/Biological_Guidelines.pdf>.
[9] For CSP, see <http://www.sdcounty.ca.gov/pds/advance/conservationsubdivision.html>.

Very truly yours,



Dan Silver, MD
Executive Director

cc: Richard Bruckner, Director

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

February 21, 2014

VIA ELECTRONIC MAIL

Esther L. Valadez, Chair
Regional Planning Commission
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

RE: Item 6, General Plan Update, General Plan Framework, Land Use, Mobility (February 26, 2014)

Dear Chairperson Valadez 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 have been stakeholders in large-scale habitat plans and/or general plan updates in Riverside, Orange, and San Diego Counties.

As you consider the framework for land use, we urge that land use designations—and the densities therein—fully reflect infrastructure, public safety, and environmental constraints. It costs the taxpayer to provide services, utilities, roads, and police and fire protection to more remote locations. Often, such areas have high wildlife values, including but not limited to Significant Ecological Areas (SEAs).

Therefore, outside of urban centers, densities should be Rural, preferably at the RL40 category but at RL20 or RL10 where existing patterns of parcelization preclude the lowest density category[1]. Estate and ranchette designations (H2, R1, R2, and R5) do not support agricultural uses and are the epitome of unwise, inefficient, auto and GHG-intensive, and land-consumptive land use. Such categories should only be used when existing parcelization has already converted an area to "rural sprawl."

By down-planning estate densities to rural categories, the County of San Diego found billions of dollars in taxpayer savings[2] and will avoid putting life and property at

[1] The unique circumstance of the Tejon Ranch Land-Use and Conservation Agreement should be considered as justification for an exemption to an RL designation because the Agreement effectively concentrates urban development on a small portion of its holdings, facilitating conservation over vast areas.
[2] The San Diego County General Plan Update EIR found savings of $1.6 billion in road construction costs alone, irrespective of ongoing maintenance. Also see <http://www.sdcounty.ca.gov/pds/docs/bos_may03_report.pdf> at page 21, Public Costs, for comparison of municipal vs unincorporated service costs.

8424 SANTA MONICA BLVD SUITE A 592 LOS ANGELES CA 90069-4267 ♦ WWW.EHLEAGUE.ORG ♦ PHONE 213.804.2750

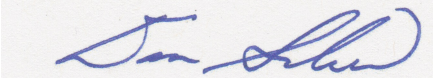
risk of wildfire. Los Angeles County should follow suit, and instead focus growth at higher densities in appropriate locations.

Unless RL40 (or RL20 or RL10) are applied in SEAs, it will be impossible for the County to successfully implement the SEA Ordinance and achieve biological goals for these unique regions. As a vital and complementary land use tool, we also strongly urge your Commission to implement mandatory "clustering" at Rural densities. Once lot size is decoupled from density, substantial open space and agricultural benefits accrue. The County of San Diego Conservation Subdivision Program provides an off-the-shelf model[3].

In conclusion, without use of low RL densities and without clustering, protecting SEAs and rural and agricultural values will prove impossible.

Thank you for considering our views.

Sincerely,



Dan Silver, MD
Executive Director

cc: Richard Bruckner, Director

[3] For CSP, see <http://www.sdcounty.ca.gov/pds/advance/conservationsubdivision.html>.

From: Dan Silver
Sent: Thursday, April 10, 2014 6:09 PM
To: Emma Howard
Cc: Carl Nadela; Susan Tae
Subject: Re: SEA Report for RPC Language.

Emma,

Thank you very much for including this language in the staff report, which responds to the concerns raised and which allows us to continue to work with you. I will carefully review the entire staff report as well as testify at the hearing.

We appreciate your taking the time to communicate, and with best regards,
Dan

On Apr 10, 2014, at 5:36 PM, Emma Howard <ehoward@planning.lacounty.gov> wrote:

Hi Dan,

We submitted our RPC report to the commission today. As per our discussion with EHL, we included language in the report that explains to the Commission that we're still working on the avoid and minimize issue and commits us to making a change to align with your comments. Here's the language, its located on page 8, in a section called SEA Program Issues for Further Consideration. The whole report is 10 pages long to cover the whole SEA Program which is why this is such a brief blurb:

Finding of Minimal Impact
Several environmental groups have found the proposed SEA Ordinance findings "limiting." While the Ordinance sets out higher set aside requirements or processes for development projects that impact more sensitive resources, it does not contain language that would require that an applicant first look to avoid or minimize impacts. Staff agrees with the comments received on this issue, and will propose revised language to address projects designed with avoidance or minimization of impacts.

The whole staff report can be downloaded here: http://planning.lacounty.gov/sea/ordinance, and I think the tech folks are still uploading so of the attachments, so you can check back tomorrow or Monday if the other attachments aren't showing up yet. We have a few more comment letters that we're putting together, so if you don't see EHL in the attachment, we will have it in our next submittal, which goes up next Thursday.

Thank you for your work on this!

Regards,
Emma

Emma Howard
Regional Planner

Community Studies North Section
Department of Regional Planning
http://planning.lacounty.gov/sea
Telephone: 213-974-6476

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169

John L. Scott, Sheriff

April 9, 2014

RECEIVED
APR 14 2014
BY:

Richard J. Bruckner, Director of Planning
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, California 90012

Attention: Ms. Emma Howard

Dear Mr. Bruckner:

REVIEW COMMENTS
DRAFT 5 OF THE SIGNIFICANT ECOLOGICAL AREAS ORDINANCE
(LOS ANGELES COUNTY CODE, TITLE 22)

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the fifth draft (Draft 5) of the Significant Ecological Areas Ordinance (SEA Ordinance). Draft 5 of the SEA Ordinance was released on March 25, 2014, and reflects changes to previous drafts of the SEA Ordinance.

Revisions contained in Draft 5 of the SEA Ordinance appear to be technical and organizational, but do not seem to affect policies contained in the SEA Ordinance itself. Accordingly, the Department concludes that previously submitted review comments remain pertinent (see attached correspondence dated January 27, 2014, and March 25, 2013). Although no further comment will be submitted at this time, the Department reserves the right to further address this matter if Draft 5 of the SEA Ordinance is subsequently revised.

Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012, and refer to Facilities Planning Bureau Tracking No. E14-019. You may also contact Mr. Miyoshi via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

JOHN L. SCOTT, SHERIFF

Gary T.K. Tse, Director
Facilities Planning Bureau

LM

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169

Leroy D. Baca, Sheriff

January 27, 2014

Mr. Richard J. Bruckner, Director of Planning
Department of Regional Planning
320 West Temple Street, Room 1390
Los Angeles, California 90012

Attention: Ms. Emma Howard

Dear Mr. Bruckner:

REVIEW COMMENTS
DECEMBER 2013 SIGNIFICANT ECOLOGICAL AREAS ORDINANCE DRAFT 4
(LOS ANGELES COUNTY CODE, TITLE 22)

The Los Angeles County Sheriff's Department (Department) submits the following review comments on the December 2013 Significant Ecological Areas Ordinance Draft 4 (2013 SEA Ordinance). The proposed 2013 SEA Ordinance is an updated draft of the 2012 Significant Ecological Areas Ordinance (2012 SEA Ordinance), which was reviewed by the Department in March 2013 (see attached correspondence).

The Department conducted a comparative analysis of the current and previous drafts of the SEA Ordinance, and notes that the proposed 2013 SEA Ordinance has been reorganized, introduces various new concepts and terminology, and increases levels of specificity with regard to development standards and restrictions. These changes do not appear to affect the Department's resources or operations. As such, the Department concludes that previously-submitted review comments remain applicable. Although no further comment will be submitted at this time, the Department reserves the right to further address this matter if the proposed 2013 SEA Ordinance is subsequently revised.

Thank you for including the Department in the review process for the proposed 2013 SEA Ordinance. Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012 and refer to Facilities Planning Bureau Tracking Number 13-080. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF

Gary T.K. Tse, Director
Facilities Planning Bureau

A Tradition of Service Since 1850

Lo-Star

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169

Leroy D. Baca, Sheriff

March 25, 2013

Mr. Richard J. Bruckner
Director of Planning
Department of Regional Planning
320 West Temple Street, Room 1390
Los Angeles, California 90012

Attention: Ms. Emma Howard

Dear Mr. Bruckner:

REVIEW COMMENTS
SIGNIFICANT ECOLOGICAL AREA ORDINANCE – THIRD DRAFT
(TITLE 22 OF THE *LOS ANGELES COUNTY CODE*)

The Los Angeles County Sheriff's Department (Department) submits the following review comments on the Draft Ordinance (Ordinance), dated December 20, 2012, for Significant Ecological Areas (SEA). The proposed Ordinance will amend Title 22, Planning and Zoning, of the *Los Angeles County Code* by establishing regulations for development activities within SEAs to ensure such activities do not unduly threaten the future existence of underlying ecological systems located therein. The purpose of the proposed Ordinance is not to preclude development within these areas, but to maintain and possibly enhance the County's scenic and environmental resources.

The proposed Ordinance is not expected to significantly impact the Department's operations or resources. However, to the extent possible, emergency access for Department personnel, vehicles, and equipment must be maintained through SEAs in order to protect public health, safety, and welfare.

The Department has no other comment to submit at this time, but reserves the right to further address this matter in subsequent reviews of the proposed Ordinance.

Thank you for including the Department in the environmental review process for the proposed Ordinance. Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012 and refer to Facilities Planning Bureau Tracking No. 13-003. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF

Gary T.K. Tse, Director
Facilities Planning Bureau

From: Emma Howard
Sent: Wednesday, February 26, 2014 11:01 AM
To: Mark Osokow; Carla Bollinger
Cc: Susan Tae; Carl Nadela
Subject: RE: Correction: SEA Profile: Section 23: Santa Susana Mountains and Simi Hills SEA: Chatsworth Nature Preserve

Mark,

We'll add the area to our list to consider changing. Any scientific documentation of the biological value of that area would be helpful (studies, reports, etc) as well as an explanation of the SEA Criteria that this area meets. SEA Criteria are given in each SEA Description: http://planning.lacounty.gov/assets/upl/sea/23_Santa_Susana_Mountains_and_Simi_Hills_SEA_Spring_2012_GP.pdf (see page 11).

Our final recommendations for the SEA Boundaries will be released with our staff report to the Regional Planning Commission in advance of the public hearing that covers the SEA Program on April 23rd. If we decide to add it, we'd put it on the proposed map and document that change in our staff report.

If we should decide not to recommend adding this area, the next step you would be able to take is testifying directly to the Regional Planning Commission, either in writing or at that hearing- they'll make the ultimate decision before the SEA Program goes to the Board of Supervisors.

You can work directly with my colleague Carl Nadela on the status of boundary requests going forward- he's lead on any modifications to the map. He is copied on this email and we share the same phone number.

Thanks,
Emma

Emma Howard
Regional Planner
Community Studies North Section
Department of Regional Planning
http://planning.lacounty.gov/sea
Telephone: 213-974-6476

From: Mark Osokow
Sent: Wednesday, February 26, 2014 1:21 AM
To: Emma Howard; Carla Bollinger
Cc: Susan Tae; Carl Nadela
Subject: Re: Correction: SEA Profile: Section 23: Santa Susana Mountains and Simi Hills SEA: Chatsworth Nature Preserve

Dear Emma,

Thank you for having the errors re: Chatsworth Nature Preserve corrected and for clarifying the rationale for the SEA boundary with respect to Mormon Canyon.

It would appear that the sub-watershed boundaries do not automatically bound SEA's. Woolsey Creek and Box Canyon Creeks, for example, are each subtended by their own sub-watersheds, yet both seem to be included in the SEA, along with the Browns Creek sub-watershed. Mormon Canyon is extremely valuable wildlife habitat -- with a perrenial creek flowing even in this driest of drought years, dense riparian areas, oak woodlands, etc. -- that, based on a recent San Fernando Valley Audubon Society survey (see e-bird), supports an abundance of bird species; including raptors. We believe it should be included in the SEA. What would be needed to change the boundary of the SEA to bring that about or to assure its inclusion in a separate SEA?

From: Emma Howard
Sent: Thursday, March 20, 2014 11:30 AM
To: 'Frary, Matthew'
Subject: RE: Proposed SEAs and Other County Departments

Matt,

A few follow ups:

"Grandfathering" in our draft ordinance is not tied to CEQA documents. It's based on DRP permitting. That often means that we grandfather complete applications that may not have finalized CEQA documents, or grandfather based on a valid permit. Conditional Use Permits require CEQA analysis, but overall, I just want to make sure I didn't give the impression that it's based on CEQA. New construction after approval would be grandfathered depending on the terms of the approved permits and the way the applicability sections of the ordinance are written.

However, that "grandfathering" provision is specifically tied those of private developers, not to County Departments, where our entire process is different, because we do not approve projects per se. We merely require consultation and an opportunity to make non binding recommendations. Specific processes for each department are being developed and would be implemented on a department to department basis. These documents are not finalized, but it isn't our intent to require finished projects to suddenly go through a new consultation process after the SEA ordinance is adopted, it would be related to new projects.

The SEA Ordinance does not conflict with CEQA compliance. Where you have State or Federal environmental studies and impacts mitigation you should be able to use the majority of those documents as the information required for our ordinance. However, our program is tasked with protecting the SEAs specifically, which is not necessarily the main consideration of the State and Federal requirements. Implementation of the SEA Ordinance is one of the primary ways that the County meet its own CEQA requirements for the General Plan; the umbrella covering all new development and all new infrastructure for the next 20-30 years, including all projects undertaken by the Department of Public Works. That's why we are moving in a direction where our departments have a dialogue about building in the SEAs, so that we make sure we're adequately reflecting how different General Plan goals and policies are being met.

If you check in with your coworkers who were at our previous meetings, I know we'd welcome you at any future meetings, maybe they can add you to their internal list so we make sure you are there? Your perspective will be helpful as someone in the process of handling a large project.

Regards,
Emma

From: Frary, Matthew
Sent: Tuesday, March 04, 2014 2:58 PM
To: Emma Howard
Subject: Proposed SEAs and Other County Departments

Good afternoon Emma:

Thanks for speaking with me earlier this afternoon about the proposed SEAs. Below is a summary of what I gleaned from Troy and yourself:

- The tentative Board adoption of the new SEA boundaries/ordinances (w/ general plan) is likely Fall 2014 at the earliest, but dependent on a number of factors.
- There are 2 main changes in the revised ordinances that regulate developments in SEAs:

- Today, any parcel that includes even a portion of SEA is under ordinance even if not working on that portion… moving forward, if not working on the SEA portion, you're ok…
- New 2-tier system so smaller projects can be more stream-lined.

- CEQA documents are based on baseline conditions, so we're not subject to SEA ordinances if our CEQA document adopted before the new boundaries. We will be "grandfathered" in even if construction occurs after adoption.
- Even if new SEAs in effect, other County agencies will not be subject to permit from DRP. Instead, DRP would perform a consult process (e.g., perform bio review for large projects) and submit recommendations, but then up to DPW as what to do with them. The comments are not binding, especially if counter to completing our own Department's mission.
- A few DPW staff have been involved in the process… you mentioned Steve Berger, Juan Sarda, Bella Hernandez, Fabrizio Pachano, and Pat Wood. Thanks for passing along those contacts.

Please let me know if I've misunderstood anything.

Also, it does seem strange/redundant that SEA ordinances would apply at our Flood Control Facilities that are already regulated by the State and Feds. As discussed, our CEQA document already discusses the present biological resources, etc, and elaborates on impacts and mitigation as necessary.

At this point, I expect our CEQA document to be adopted well before the new DRP General Plan. If not, we will adjust things accordingly.

Thanks again, and have a great day.

Matt Frary, P.E.
Dams Section
Water Resources Division
LA County Department of Public Works

Puente Hills
Habitat Preservation Authority
Endowment Provided by the Puente Hills Landfill

February 3, 2014

County of Los Angeles
Department of Regional Planning
Attn: Emma Howard
Regional Planning Department
Room 1354
320 W. Temple Street
Los Angeles, CA 90012

Comments on the Draft Significant Ecological Area Ordinance dated December 5, 2013
Comments on the Preliminary Draft Significant Ecological Area Program Guide dated 2013
Comments on the SEA Developed Area and SEA Boundary maps

Dear Ms. Howard:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the Draft Significant Ecological Area (SEA) Ordinance (dated December 5, 2013). The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to its mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency endeavors to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority owns and or manages over 3,800 acres which lie within the Cities of Whittier and La Habra Heights, as well as in the County unincorporated areas of the Puente Hills known as Hacienda Heights and Rowland Heights.

The Habitat Authority thanks and acknowledges the Department of Regional Planning for the incorporation of certain comments on the previous SEA Ordinance Summary Draft dated June 2012, and December 20, 2012. These comments included suggested language for development standards within SEAs, such as exclusion of invasive plants, fencing to promote wildlife movement, and avoidance of habitat impacts from fuel modification. However, certain comments were not addressed in the current Draft Ordinance and are included below for reference, along with additional comments.

A Joint Powers Agency created pursuant to California Government Code §6500 *et seq.*
7702 Washington Avenue, Suite C, Whittier, California 90602 • Phone: 562 / 945-9003 • Fax: 562 / 945-0303

Printed on recycled paper

SEA ORDINANCE

Section 2 - 22.08.190

The definition of an SEA has been removed and now states that an SEA "means: any portion of a lot or parcel of land identified as a Significant Ecological Area on the Significant Ecological Areas and Coastal Resource Areas Policy Map of the General Plan". The latest draft (Jan 2014) of the General Plan describes an SEA but it is difficult to locate under Appendix E (not in Appendix C like Section 22.52.2905 subsection "O" of the Ordinance mentions). To alleviate any misunderstandings as to what constitutes an SEA and to make the definition easy to find and understand, please consider adding the definition of an SEA to section 22.52.2905 of the SEA Ordinance.

Section 22.52.2905 – Definitions

Definition A. "Connectivity Area" and Definition B. "Constriction Area" – Both definitions include the phrases "large undisturbed areas". Please define what constitutes "large" since this can be interpreted in varying ways.

The definition of "Ecological Transition Area" has been removed and is no longer mentioned in the SEA Ordinance. It is referenced once in the General Plan on page 382. If this term is no longer used, please be sure it is removed from all documents. However, if it is still being used, add the definition back into this section.

Definition O. "SEA Description" – This definition states that "SEA Description means the description of species populations and SEA Habitat Types within each SEA provided in the General Plan (Appendix C)". However, the description seems to be located in Appendix E. Please double check the location of the "SEA Description". There is a good description of an SEA in the *Preliminary Draft Significant Ecological Areas Program Guide* that could be used.

Definition P. "SEA Development Map" – According to this definition, the development map also depicts Habitat Preservation Areas and other Natural Open Space Areas. However, only the red proposed- developed areas are showing up on the GIS-NET3 "SEA Proposed-Developed Areas" layer. If Natural Open Space areas are to show up, then the Puente Hills Preserve should be highlighted.

Based on the comment under Section 2 (22.08.190), please consider adding a general definition of an SEA to this section of the SEA Ordinance.

It is suggested to add a definition of "Site plan review" since SEA conditional permits A and B are described.

Section 22.52.2910 - Applicability

Subsection C.1.We understand that projects outside of SEAs are not subject to this Ordinance, however, please consider that for projects immediately adjacent to SEAs that they be reviewed by the County Biologist for compatibility. Just as the Fire Department, Parks, and other County departments review projects prior to approval, so to would the County Biologist in these instances, and would check the project for compatibility issues associated with noise, lighting, runoff, etc.

Subsection C.2 and C.3. We recommend that this standard also consider any cumulative effects from other nearby projects that may have not been approved when the original permit was approved but which could now have a cumulatively negative impact on biological resources within the SEA.

Subsection C.6. It is recommended that the SEA Ordinance apply to new projects undertaken by public utilities that may directly or indirectly (such as lighting for a new tower on top of an existing structure or adding height beyond 200 feet to an existing structure) affect habitat.

Subsection C.7. The exemption from the SEA Ordinance noted in Subsection C.7. is for "any of the following activities required, requested, authorized or permitted by a governmental agency: (a) Removal or thinning of vegetation for fire safety or in response to an emergency; and (b) Hazard management activities in response to an emergency or other public safety concerns." We suggest that activities involving removal of non-native vegetation (including by herbicide) and habitat restoration (including, but not limited to, seeding, planting of container plants, and irrigation) also be exempted activities by open space management government agencies. We also suggest exemption of government agency activities such as scientific studies, erosion control, and construction, maintenance or demolition of trails, structures or facilities necessary for open space management activities.

Section 22.52.2915–Permitted Uses

Subsection A.2 This subsection allows for uses or projects located within developed areas identified in the SEA Development Map. However, based upon a review of the Proposed Developed Areas available through the Department's GIS-NET3, many of these mapped areas in the proposed Puente Hills SEA appear to be incorrect. Some existing fuel modification zones are mapped, and others are missing. Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas that are identified as developed that are on Habitat Authority properties. Since the Habitat Authority will not be allowing expansion of development activities within fuel modification zones on lands managed/owned, this layer on the map needs to be adjusted. See attached comments. In addition, the Authority's and County's trails are not identified as developed. The Habitat Authority would be happy to share its trails GIS layer, and to work with the Department to create an accurate map of the developed areas and trails.

Subsection A.4 and A.5 This allows for expired projects that are deemed fundamentally similar to the previous authorization and for modifications to previously approved projects. We suggest that these projects prohibit the removal of any native habitat that may have developed or recovered on or adjacent to the site, and consider protection of any sensitive species or important wildlife movement corridors that may have since been identified. In addition, we recommend that this standard also consider any cumulative effects from other nearby projects that may have not been approved when the original permit was approved but which could now have a cumulatively negative impact on biological resources within the SEA.

Subsection A.6 This allows for activities conducted by governmental agencies to improve the quality of biological resources in an SEA, including non-native vegetation removal programs, native habitat restoration programs, and construction of wildlife under and overpasses for habitat linkages and wildlife corridors. It was requested earlier in this letter and in previous letters that such activities be exempt and we still make that recommendation, as they are conducted for the sole benefit of

habitat improvement and generally have very minor impacts. However, if they remain as Permitted Uses requiring Site Plan Review, it is our understanding that such review would only apply to new or existing programs, and would not be required for every individual project, some of which are quite small and isolated. For example, the Habitat Authority has an existing Resource Management Plan (RMP) which includes non-native vegetation removal and habitat restoration programs; it is our understanding that the RMP could be submitted for Site Plan Review and approval, and that any subsequent activities consistent with that RMP would be permitted without individual site plan review. This would include , that activities such as scientific studies, erosion control, and construction, maintenance or demolition of trails, structures or facilities necessary for open space management activities be exempt as requested earlier in this letter and in previous letters; If these activities are not exempt then the intent of the Ordinance may be defeated by the abundance of County staff resources necessary to follow up and make site visits that would be required per this proposed Ordinance due to the many activities of governmental land management agencies county-wide. These activities described above are integral to the management of biological resources, and often have minor impacts compared to other permitted uses such as single-family residences. The requirement for open space management activities (such as non-native vegetation removal or demolition of trails) to undergo a Site Review or Conditional Use Permit process would needlessly cost the County, and land management agencies (which are already struggling with limited resources) additional unanticipated funds which could be used for actual improvement of biological resources and would unnecessarily delay safety, maintenance, and educational management actions on properties enjoyed daily by the public. Please also consider indicating in the ordinance that the Site Plan approval has no term limits.

Subsection C. Surface mining can severely erode the soil, reduce soil fertility, and contribute toward air pollution as well as impact water quality, native vegetation and wildlife. Due to these environmental impacts of surface mining and the irreplaceable biological resources in SEAs, please consider not allowing surface mining activities in SEAs. If surface mining is allowed, please consider limiting the amount and types of surface mining activities that will be considered by the County, describe the means for environmental review, limitations and mitigation.

Section 22.52.2925 - Development Standards

This section lists the development standards non-exempt activities would need to adhere to when conducted within SEAs.

Subsection A.1. This subsection states that "Landscaped area within an SEA shall not include invasive species listed in the Invasive Species List of the SEA Design Manual." Please consider the following revised language (new text in **bold**): "Landscaped areas within an SEA shall not include invasive species listed in the Invasive Species List provided in the SEA Program Guide **or has a California Invasive Plant Council inventory rating of high or moderate**."

Subsection A.2. This subsection notes that "all outdoor lighting shall comply with the standards in Part 9 of Chapter 22.44", which refers to the Rural Outdoor Lighting District. Please add clarifying language indicating that these lighting standards shall apply even if the SEA is not located within the Rural Outdoor Lighting District.

Subsection A.6. This subsection notes that new development may not narrow Connectivity Areas to a width of less than 1,000 feet at any point. Please provide a justification for the minimum width of 1,000 feet.

Subsection A.7. Similarly, new development may not narrow Constriction Areas to a width of less than 200 feet at any point. Please provide a justification for the minimum width of 200 feet.

December 20, 2012 draft Subsection J. This section included requirements for activities that may affect special status species and was excluded from the current draft. Please consider adding the information in Subsection J of the Dec. 20, 2012 draft back into the Ordinance. Also consider the following revised language for clarification (new text in **bold**, deleted text in strikeout): "When any ground disturbance, use, or project may encroach upon a **an individual of or habitat for** a ~~likely to occur~~ species of special status identified in the SEA's Description in the General Plan and/**or** discovered during the biologist site visit required by Section 22.52.2650.B.1, such ground disturbance, use or project shall not impact an area of exceeding ~~50~~**10** percent of the habitat area for the species of special status on the lot or parcel of land." Changes in the first part of the sentence are suggested to clarify that encroachments could occur to individuals or habitat, and that special status species other than those identified in the SEA's Description could be discovered by the biologist. The change in the last part of the sentence, from 50 to 10 percent, represents a more conservative approach and would reduce the threshold for requiring a Conditional Use Permit. Depending on the species or size of the parcel, removal of half of the habitat for a special status species could threaten the viability of a population on that parcel or even within the SEA, and should require additional analysis.

Subsection A.9. This section appears to be missing. The Ordinance goes from Subsection A.8 to A.10.

Subsection A.11c. table. In the table, the setback requirement for "vernal pools, and playas" is 150 feet. To protect the watershed and uplands that provide habitat for amphibians, reptiles and vernal pool plant pollinators, consider increasing the buffer distance to 250 feet as this is the standard setback distance to protect vernal pool species per the U.S. Fish and Wildlife Service.

Finally, we suggest adding an additional standard, which would require that structures be clustered as close as possible to other existing structures and be located as close as possible to existing roads in an effort to reduce fragmentation and edge effects.

Section 22.52.2930 – Conditional Uses

Subsection C. This subsection states that "Any development that is otherwise permitted by Section 22.52.2915.A but would occur at the site of the habitat for an undiscovered or previously thought extinct species, as discovered during the biologist site visit required by Section 22.52.2920.A.2." Please consider the following revised language (new text in **bold**): "Any development that is otherwise permitted by Section 22.52.2915.A but would occur at the site of the habitat for an **observed species of special status** or an undiscovered or previously thought extinct species, as discovered during the biologist site visit required by Section 22.52.2920.A.2…" The proposed language was previously included in the December 20, 2012 draft of the SEA Ordinance.

Section 22.52.2935 –Conditional Uses – Application Procedures

Subsection C. It states that during the biological site visit, "Such site visit shall include identification and delineation of SEA Habitat Types, tree species listed in the SEA Program Guide and Water Resources." Please consider the following revised language (new text in **bold**): "Such site visit shall include identification and delineation of SEA Habitat Types, tree species listed in the SEA Program Guide, Water Resources, and special status species."

Subsection D.1.a. This lists criteria for projects within SEAs that will require a Type B CUP (for higher impact projects, requiring more open space mitigation and review by the SEA Technical Advisory Committee [SEATAC]) instead of a Type A CUP (for lower impact projects). The criterion under (a) is that "the proposed development may create an isolated area of natural habit." Assuming "natural habit" is a typo, please change to "natural habitat". Under ii for the definition of "isolated" please explain how and why the determination of "…is not continguous to at least 30% of the perimeter" was developed.

Section 22.52.2940 –Conditional Uses – Conditions of Approval

Subsection B.1.c.i. This describes open space requirements for Type A CUP conditions of approval, and gives preference to open space preserved on the same lot or parcel as the impact. This preference may not always result in the highest conservation value, especially if the resulting open space is small or isolated. Rather, preference should be given to preserving open space that is contiguous with other preserved lands, or to areas that will create or strengthen a habitat linkage or wildlife corridor. This type of strategic conservation will promote the viability of SEAs more than a piecemeal approach.

Subsection B.2.a. States that no improvements shall be allowed except for any applicable provisions in Section 22.56.215. However, this section refers to the existing Hillside Management and Significant Ecological Areas, and this section does not mention improvements that may be allowed in open space areas within SEAs. Any improvements allowed in required open space areas should be specified in this subsection, and should include (as appropriate) trails, signage, fencing, non-native vegetation removal, habitat restoration, and improvements associated with biological resource monitoring, research and management.

Subsections B.3.a. This section related to subdivision developments. This sections states that required Natural Open Space areas within the subdivision will be recorded on the final map as a "fee lot" or as an Open Space – Restricted Use Area. Please define "fee lot". It is also stated that required Natural Open Space areas will be recorded in the office of the County Recorder on a covenant and agreement. We recommend that required Natural Open Space be recorded as a conservation easement to protect the space in perpetuity.

Subsection B.3.b. This section relates to development that is not a subdivision. It is stated that required Natural Open Space areas will be recorded in the office of the County Recorder on a covenant and agreement. We recommend that required Natural Open Space be recorded as a conservation easement to protect the space in perpetuity.

Subsection B.4 c. In discussing the management of the dedicated open spaces, this section states that if a governmental agency or non-profit land conservation organization is not dedicated to the

management of open space, then "a maintenance agreement shall be established to hold and manage the Natural Open Space under a mandate to protect it in perpetuity." However, it doesn't state who the land manager would be. Please exclude Homeowners associations from managing these open space areas since they often lack the staff or expertise to manage the biological resources as necessary for SEA maintenance. In addition, along with the dedication, funds should be provided that are sufficient for land management in perpetuity.

22.52.2945 - Conditional uses – Review and Hearing Procedures

Subsection A. This states that a Type A CUP will be considered by a Hearing Officer, whereas a Type B CUP will be reviewed by SEATAC and considered by the Regional Planning Commission. Regarding Type A CUP considerations by Hearing Officers, it is our understanding that a Department staff biologist will have already reviewed the submission and made recommendations. Please clarify if this understanding is not correct

Subsection C.3. This subsection lists the Findings required for the Hearing Officer or Regional Planning Commission to issue an SEA CUP. Subsection H.3 requires that a project cannot result in the loss of SEA viability, which is defined as (a) bisecting the SEA, (b) closing of a connectivity or constriction, (c) removing habitat characteristic of the SEA, (d) removing the only known location of an SEA species, or (e) removing the only known location of a new or rediscovered species. Items b, d and e provide a very high threshold for determining the loss of SEA viability. For example, the substantial narrowing of a connectivity area, not just the closing of the constriction, could result in SEA viability loss. Or the removal of key habitats or populations of certain species could, not just the removal of the only known locations of that species, could also result in SEA viability loss. These SEA viability thresholds should be revised to be less limiting.

Appendix for Park 28

Please clarify what classification system is being used for the determination of Habitat Type.

SEA 8. Puente Hills SEA. By using the eight Habitat Types listed in the Ordinance, numerous critical habitat types will not be considered, such as native grasslands and mulefat scrub. The Puente Hills Habitat Preservation Authority has an adopted Resource Management Plan (2007) which describes the vegetation communities within the Puente Hills Preserve (Section 3.0). The RMP can be found at www.habitatauthority.org. It is recommended to use those classifications of vegetation communities.

PRELIMINARY DRAFT SIGNIFICANT ECOLOGICAL AREAS PROGRAM GUIDE

III. Exemptions. The SEA Ordinance exempts safety activities in response to an emergency and uses in areas regulated by Local Coastal Plans. As commented on in the SEA Ordinance section 22.52.2910 subsection C.7, we suggest that activities involving removal of non-native vegetation (including by herbicide) and habitat restoration (including, but not limited to, seeding, planting of container plants, and irrigation) also be exempted activities by open space management government agencies. We also suggest exemption of government agency activities such as scientific studies, erosion control, and construction, maintenance or demolition of trails, structures or facilities necessary for open space management activities.

IV. Development Standards. This section was not available at the time of review. The Habitat Authority looks forward to commenting on this section when it is available.

Streets and Highways. There is good detailed information about the types of wildlife crossings. The Program Guide currently lists 5 recommendations to consider when designing new streets or highways. Please consider stating that these recommendations should be considered when retrofitting streets and highways as well. In addition, please consider adding the following 6th recommendation in bold: **New or improved roads in SEAs, especially those adjacent to open space, should consider wildlife crossing structures.** It is most cost effective to design and install these structures while the new roads are being built or existing roads are being improved.

V. General Recommendations. This section was not available at the time of review. The Habitat Authority looks forward to commenting on this section when it is available.

VI. SEA Specific Recommendations. This section was not available at the time of review. The Habitat Authority looks forward to commenting on this section when it is available.

VII. Biological Reports Requirements.

New section. Please consider adding a section on *Preparer's Qualifications and Certifications* that must be included in the SEA Site Assessment Report (SSAR) and SEA Site Impacts Report (SSIR).

SEA Site Assessment Report Sections 2 and 3. Please consider adding additional information required in those sections. San Luis Obispo County Department of Planning and Building has detailed *Guidelines for Biological Resources Assessments (December 2009)* that could be used as a model; especially the sections on Biological Survey Process, Appendix A sections E, F, and H as well as Appendix B. This Guide can be found at
http://www.slocounty.ca.gov/Assets/PL/environmental/environmentalresources/Guidelines_Bio.pdf

SEA Site Impacts Report Section 3, 4 and 5. Please consider adding additional information required in those sections. San Luis Obispo County Department of Planning and Building has detailed *Guidelines for Biological Resources Assessments (December 2009)* that could be used as a model; especially in Appendix A section G. This Guide can be found at
http://www.slocounty.ca.gov/Assets/PL/environmental/environmentalresources/Guidelines_Bio.pdf

VIII. Invasive Species List.
Please indicate the source for the list of invasive plant species and add that plants given a California Invasive Plant Council inventory rating of high or moderate shall not be planted.

GIS-NET3 MAPS

SEA Proposed-DRAFT- layer
Please amend the proposed SEA boundary as described on the attached maps.

SEA Proposed-Developed Areas- layer
Please amend the developed area polygons as described on the attached maps.

Thank you for your consideration of our comments. We look forward to reviewing the still to come sections of the Program Guide as soon as they are made available. Feel free to contact me or Lizette Longacre, Ecologist, at (562) 945-9003 for further discussion.

Sincerely,

Bob Henderson
Chairman

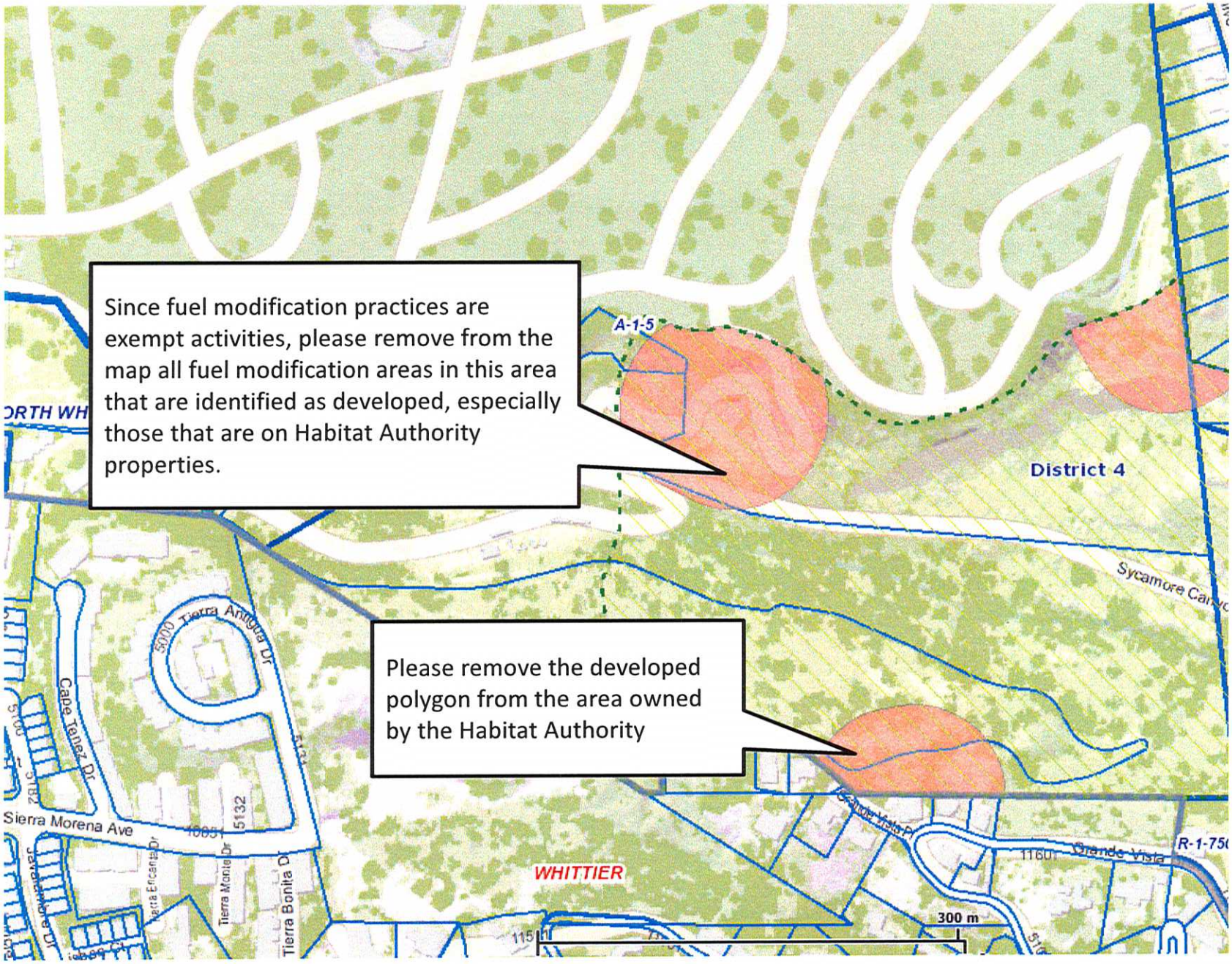
cc: Board of Directors
Citizens Technical Advisory Committee
Mitch Glaser, Los Angeles County Department of Regional Planning

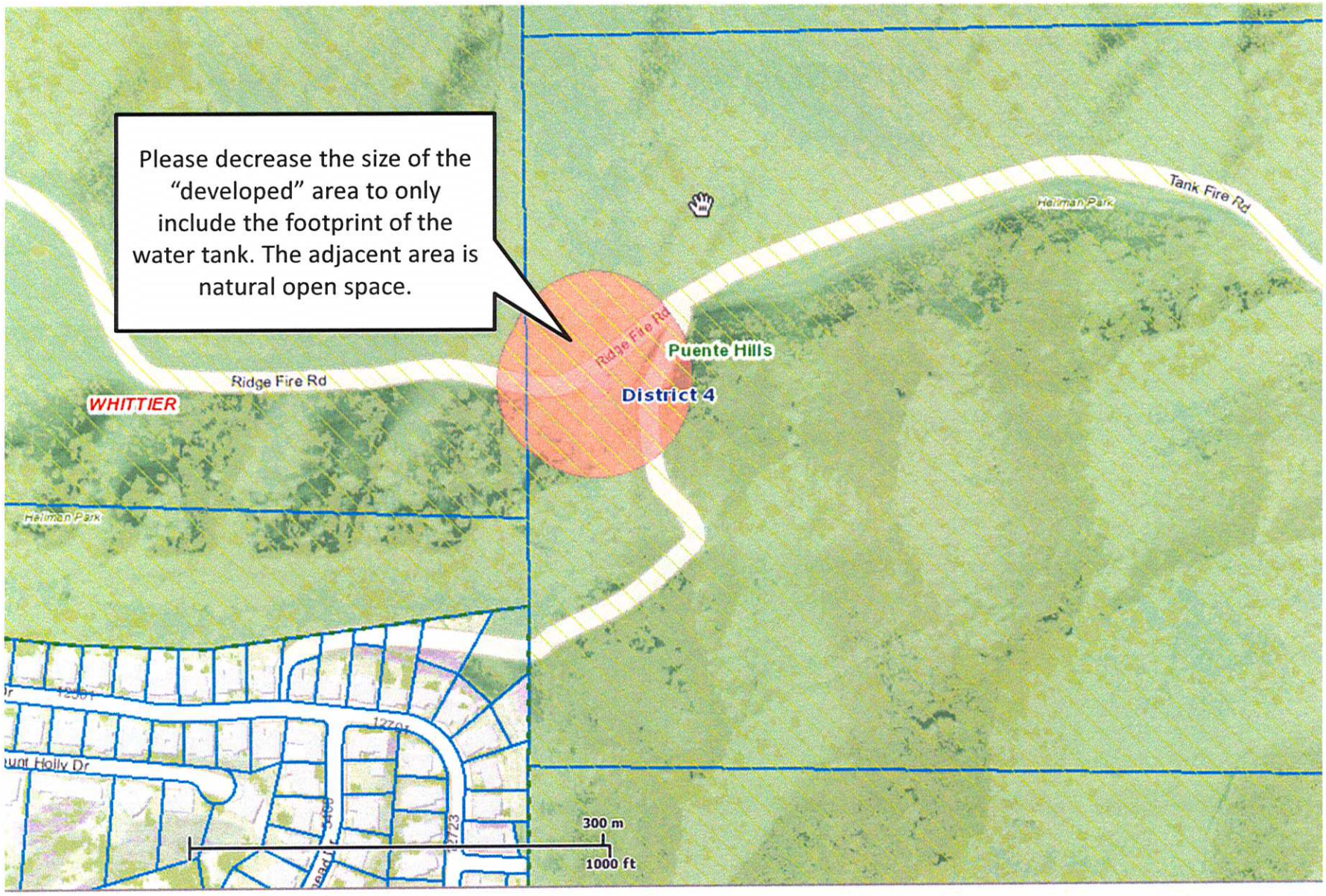
Attached:
Comments on SEA maps

Puente Hills Habitat Preservation Authority

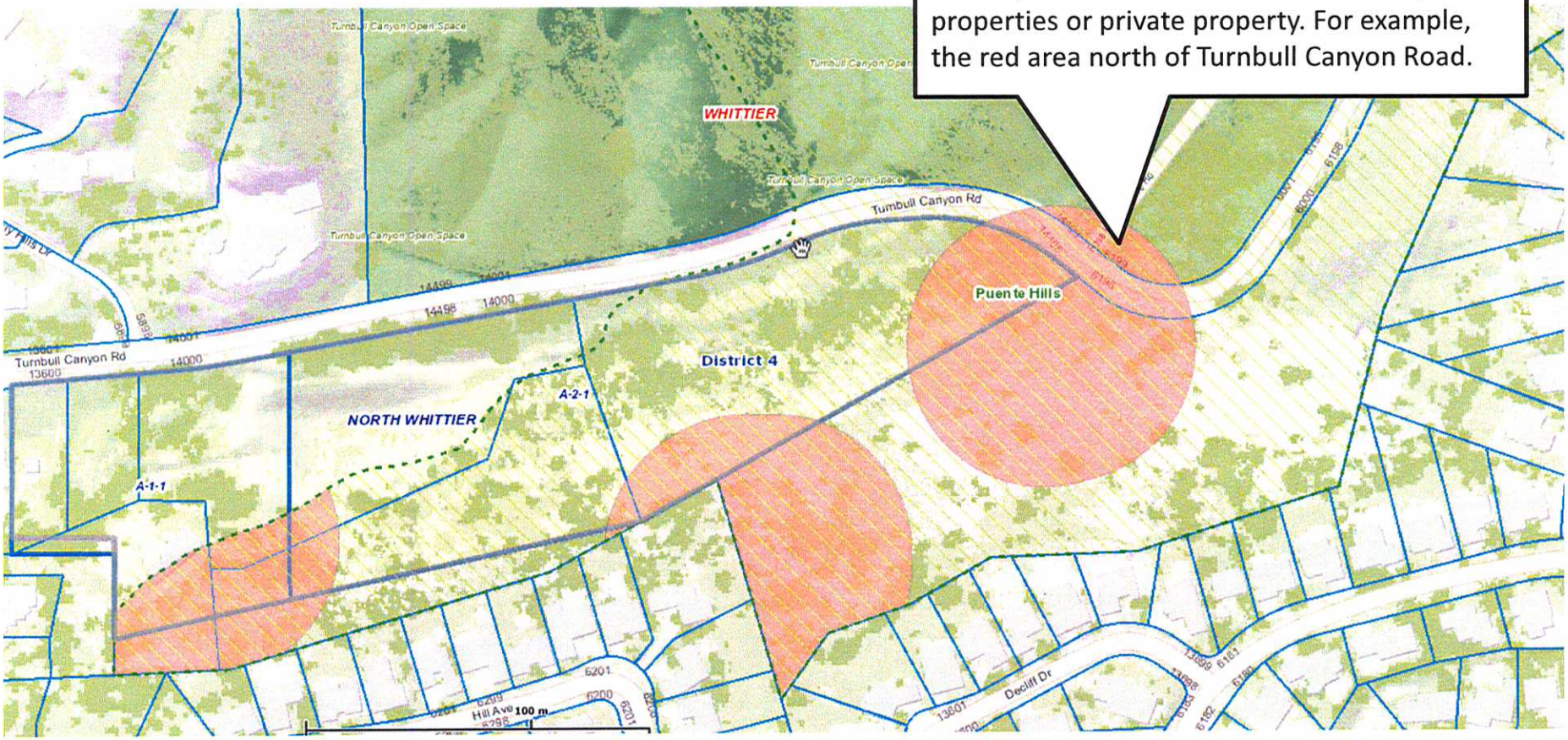
Comments on SEA Developed Area and SEA Boundary maps

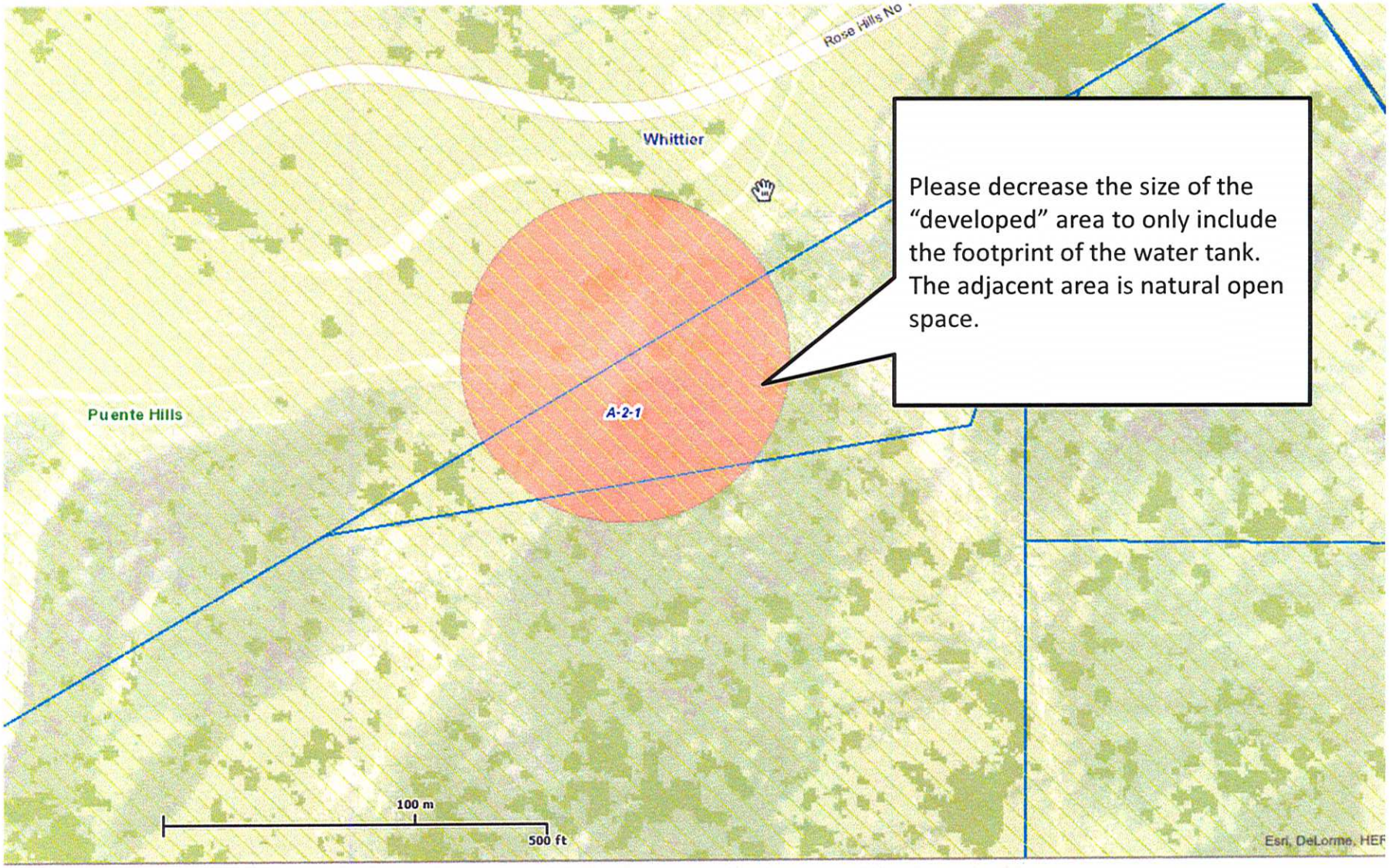
Global comment: Since according to section 22.52.2910 C7a of the SEA Ordinance fuel modification practices are exempt, please remove all developed area bubbles intended to identify fuel modification practices from the map for Habitat Authority owned or managed properties and all private properties. Identifying fuel modification areas as developed areas exposes them to future developments which counteracts the purpose of preserving the surrounding open space from impacts by future additional fuel modification requirements or other impacts from future developments.


Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas in this area that are identified as developed, especially those that are on Habitat Authority properties.
Please remove the developed polygon from the area owned by the Habitat Authority
A-1-5
District 4
Sycamore Canyo
Tierra Antigua Dr
Cape Telnez Dr
Sierra Morena Ave
Tierra Encanta Dr
Tierra Monte Dr
Tierra Bonita Dr
Grande Vista Dr
Grande Vista
R-1-75
WHITTIER
300 m

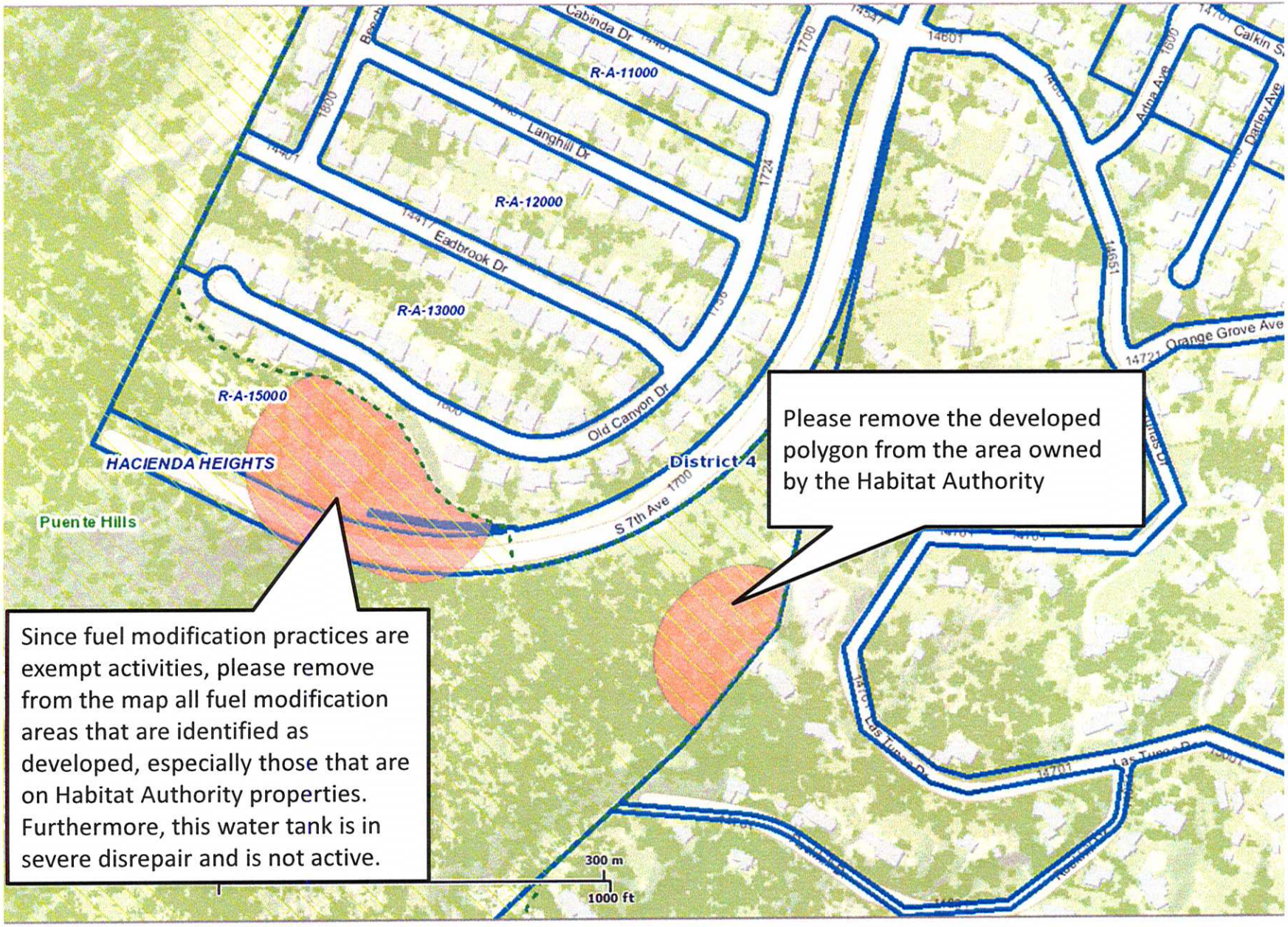

Please decrease the size of the "developed" area to only include the footprint of the water tank. The adjacent area is natural open space.
Ridge Fire Rd
WHITTIER
Ridge Fire Rd
Puente Hills
District 4
Tank Fire Rd
Heilman Park
Heilman Park
300 m
1000 ft

Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas that are identified as developed that are on Habitat Authority properties or private property. For example, the red area north of Turnbull Canyon Road.



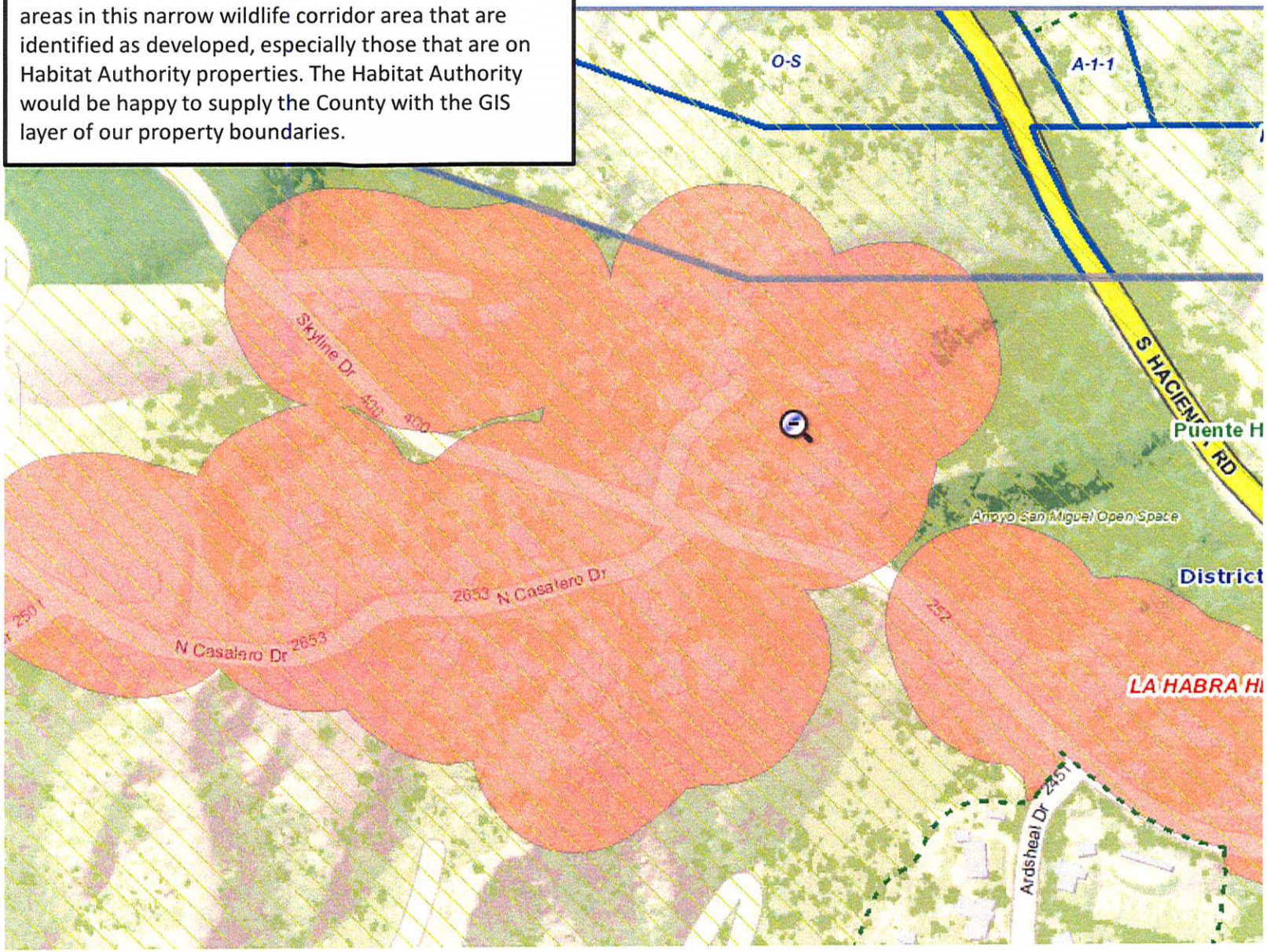


Please decrease the size of the "developed" area to only include the footprint of the water tank. The adjacent area is natural open space.


Cabinda Dr
R-A-11000
Langhill Dr
R-A-12000
Eadbrook Dr
R-A-13000
R-A-15000
Old Canyon Dr
HACIENDA HEIGHTS
Puente Hills
District 4
S 7th Ave
Orange Grove Ave
Calkin St
Adna Ave
Darley Ave
Las Tunas Dr
300 m
1000 ft
Please remove the developed polygon from the area owned by the Habitat Authority
Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas that are identified as developed, especially those that are on Habitat Authority properties. Furthermore, this water tank is in severe disrepair and is not active.

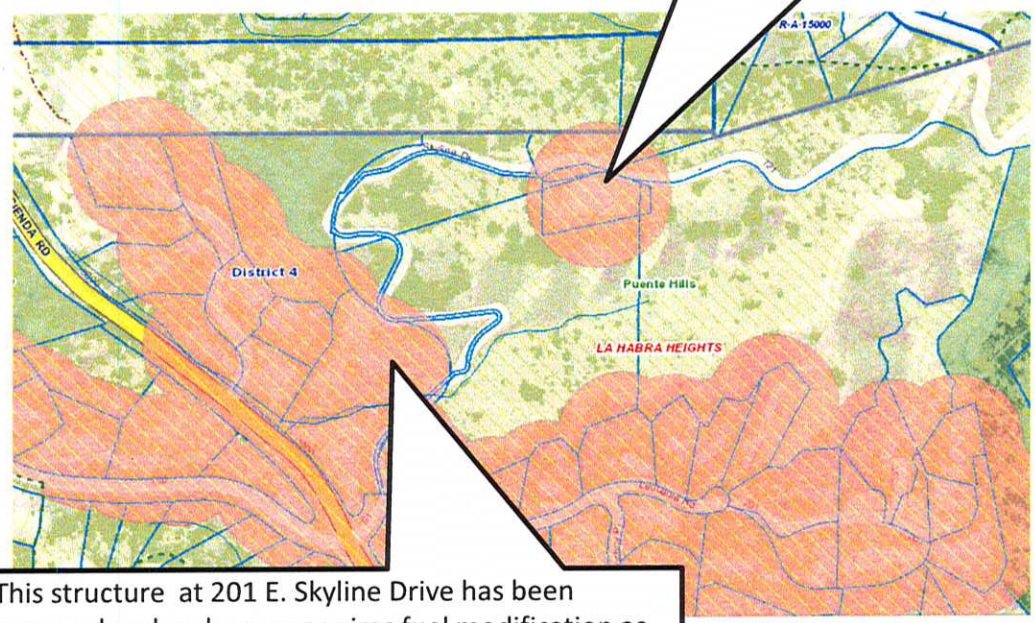
Please remove the developed polygon from the area owned or managed by the Habitat Authority
Please remove the developed polygon from the area owned or managed by the Habitat Authority
Puente Hills
District 4
WHITTIER
Whittier Area Cooperative Special Education Program
Ocean View
14505
14591
8100
Romero Dr
8000
San Lucas Dr
8100
8186
14651
14701
14765
14779
Mar Vista St
14801
14901
14921
Lodosa Dr
15001
8200
300 m
1000 ft
Ave
8100 Cielo V
COLIN

Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas in this narrow wildlife corridor area that are identified as developed, especially those that are on Habitat Authority properties. The Habitat Authority would be happy to supply the County with the GIS layer of our property boundaries.



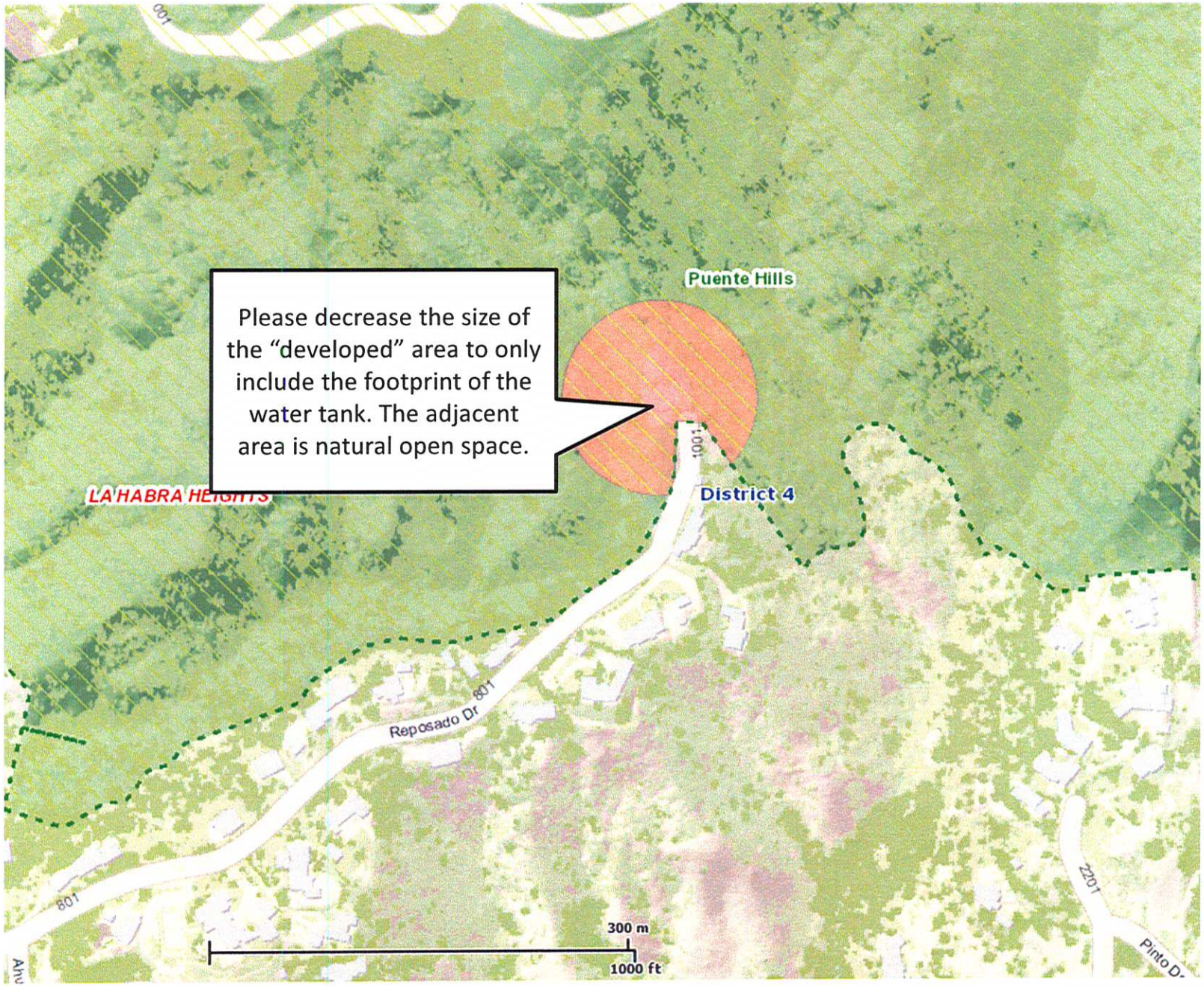
Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas in this narrow wildlife corridor area that are identified as developed, especially those that are on Habitat Authority properties. The Habitat Authority would be happy to supply the County with the GIS layer of our property boundaries.

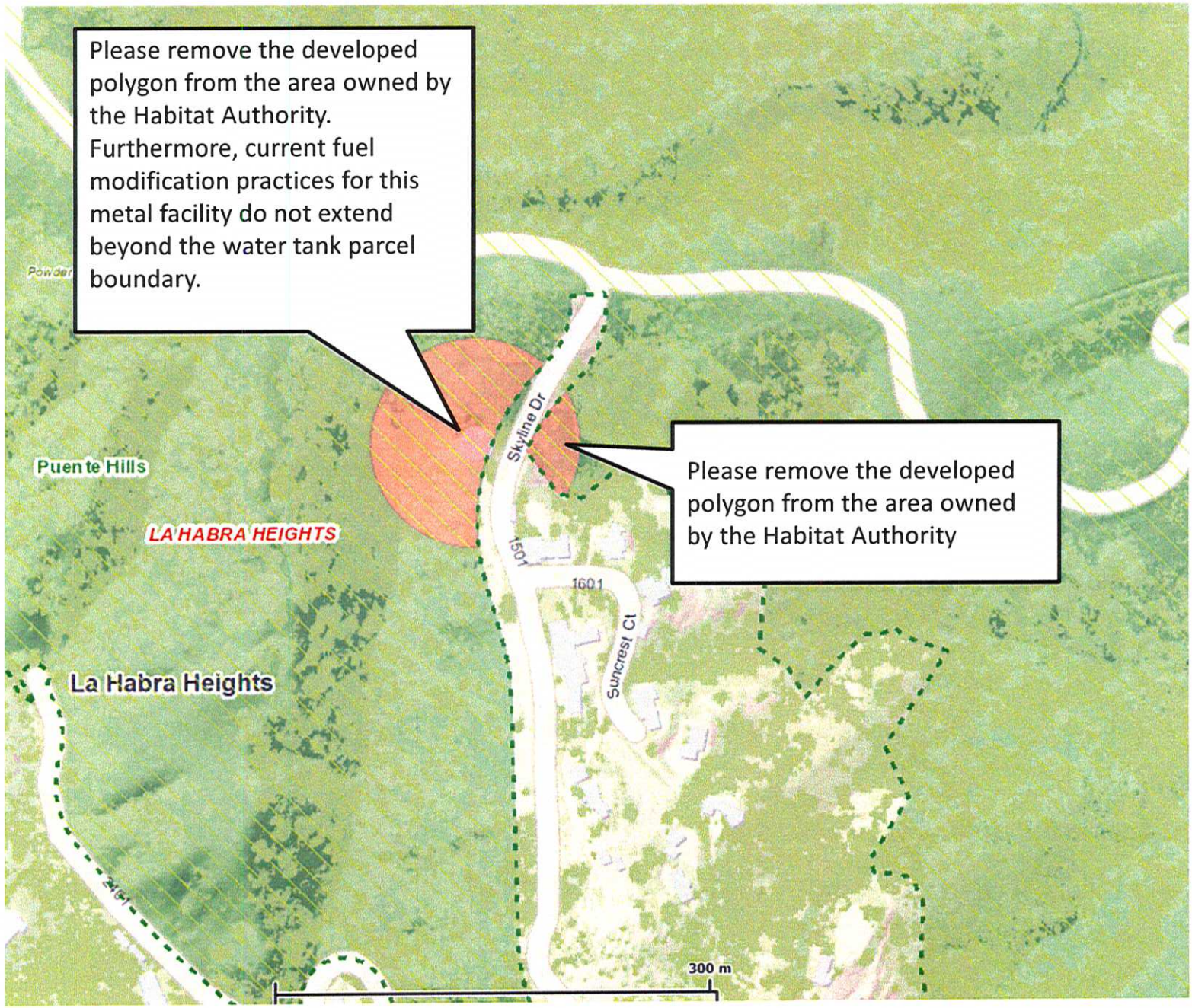
Please reduce the developed area on this map to only include the footprint of the water tank.

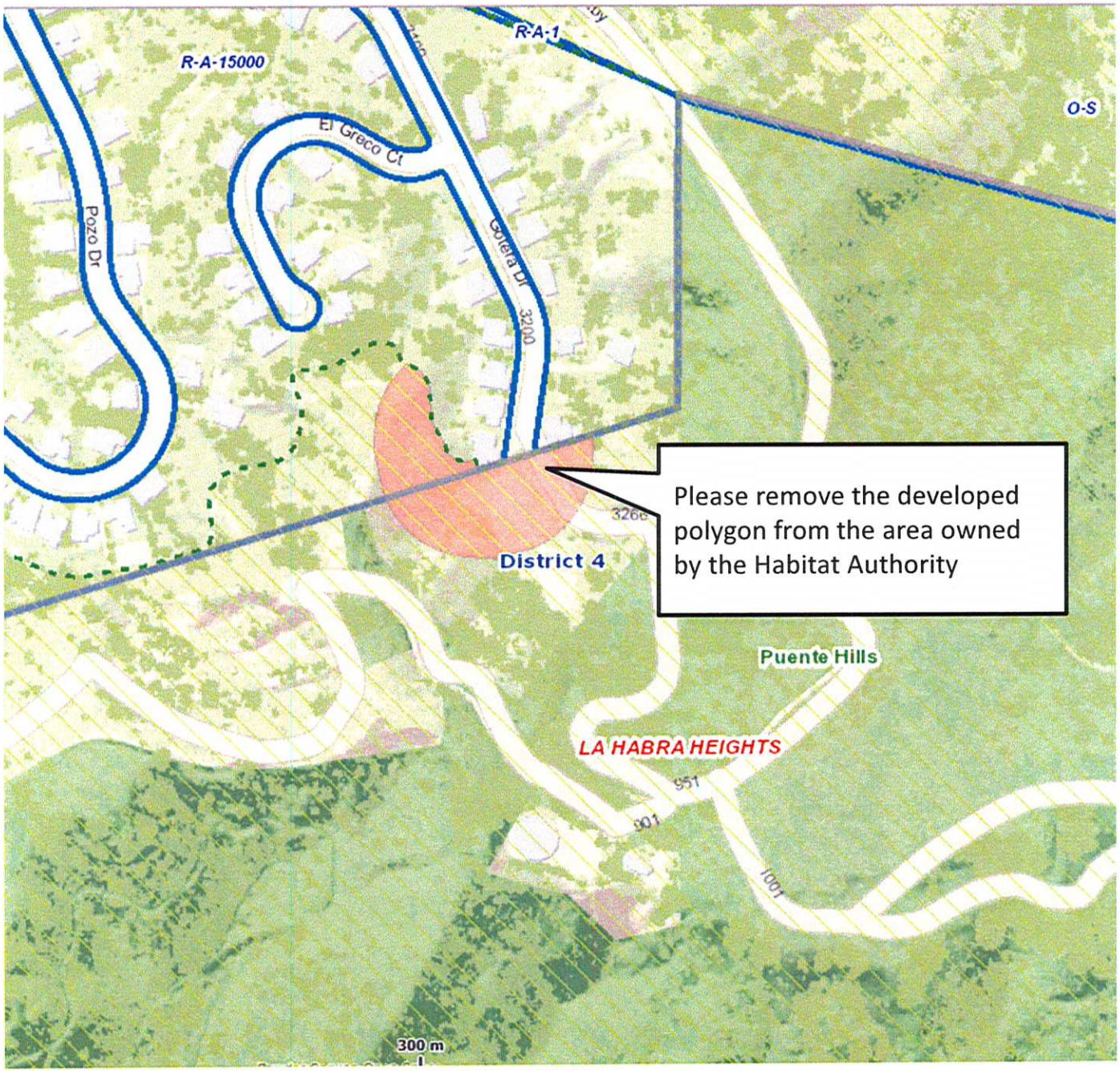


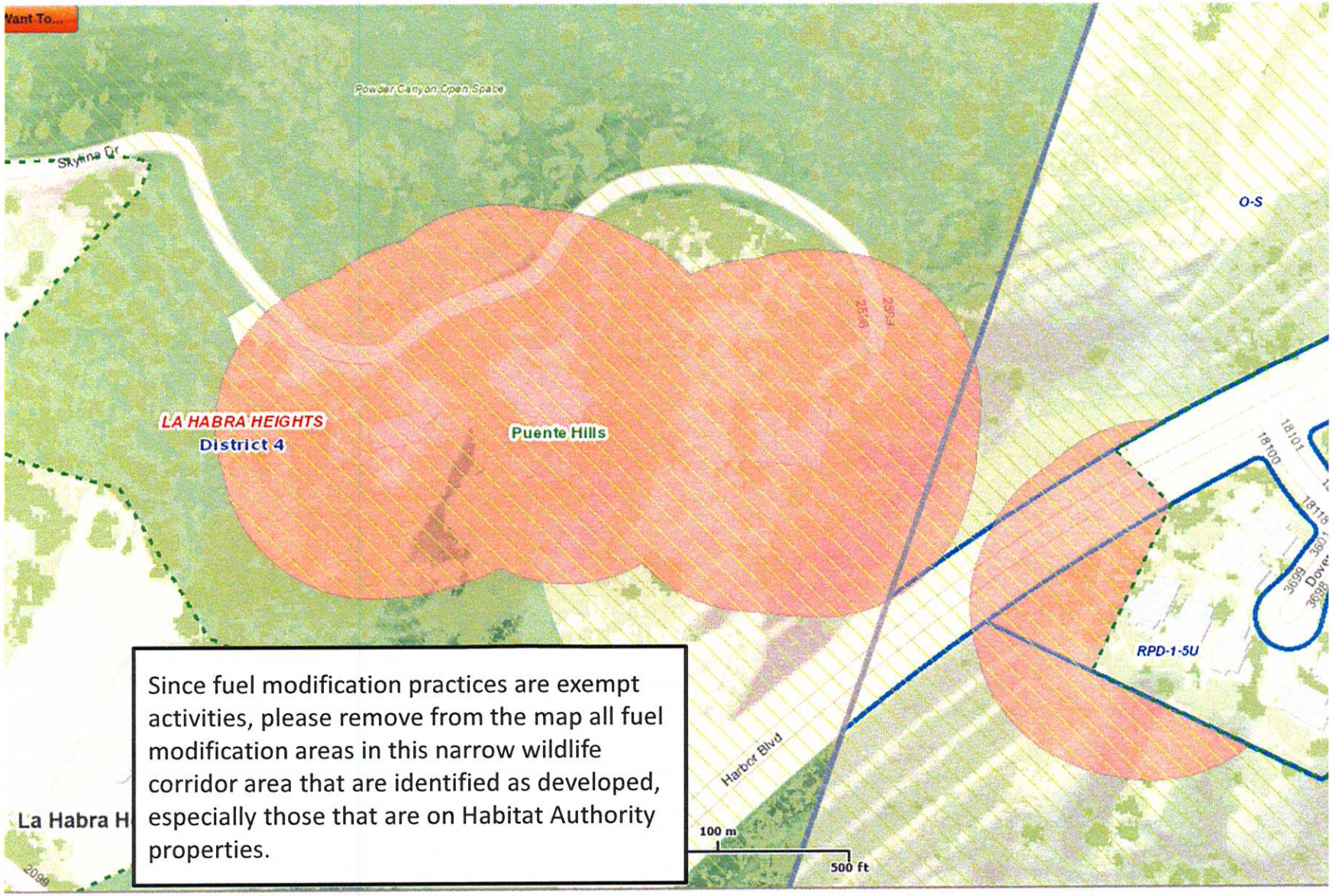
This structure at 201 E. Skyline Drive has been removed and no longer requires fuel modification as it is owned by the Habitat Authority. Please take this out of the developed area polygon.

La Habra Heights, Skyline Dr. and Hacienda Rd area


Please decrease the size of the "developed" area to only include the footprint of the water tank. The adjacent area is natural open space.
Puente Hills
District 4
LA HABRA HEIGHTS
Reposado Dr
801
1001
2201
Pinto Dr
300 m
1000 ft


Please remove the developed polygon from the area owned by the Habitat Authority. Furthermore, current fuel modification practices for this metal facility do not extend beyond the water tank parcel boundary.
Please remove the developed polygon from the area owned by the Habitat Authority
Powder
Puente Hills
LA HABRA HEIGHTS
La Habra Heights
Skyline Dr
1501
1601
Suncrest Ct
2161
300 m

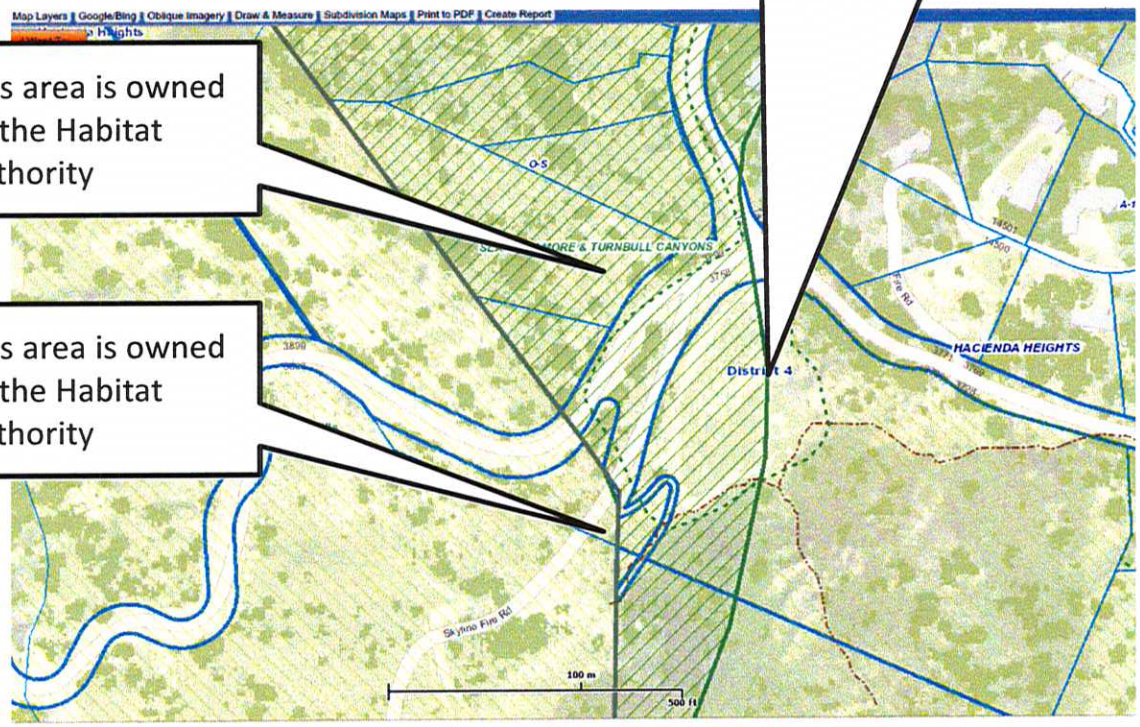

R-A-15000
R-A-1
O-S
El Greco Ct
Pozo Dr
Goleta Dr
3200
3260
District 4
Please remove the developed polygon from the area owned by the Habitat Authority
Puente Hills
LA HABRA HEIGHTS
957
901
1001
300 m



Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas in this narrow wildlife corridor area that are identified as developed, especially those that are on Habitat Authority properties.

Whittier
15801 Las Palomas Dr
Puente Hills
The boundary of the SEA at this location is questionable as it touches 16199 Aurora Crest, an existing home.
Coventry Cir
16101
16121
16201
WHITTIER
15751
16001
8000
District 4
Peterson Dr
Stoneridge Dr 8000
16227
Aurora Crest Dr
16301
16000
16034
Cerquita Dr
16066
16130
Lindante Dr
8200
Newcastle Dr 8100
2375
Le Flore Dr
8400
300 m
1000 ft

Please add this area back into the designated SEA as any future development here would most likely require fuel modification clearance on Habitat Authority property and which subsequent permission for such clearance would be denied by the Habitat Authority.



This area is owned by the Habitat Authority

This area is owned by the Habitat Authority

Hacienda Heights, Turnbull Canyon Road area

-----Original Message-----
From: Lizette Longacre
Sent: Thursday, April 03, 2014 3:24 PM
To: Joseph Decruyenaere
Cc: Emma Howard; Carl Nadela; Susan Tae; Andrea Gullo
Subject: RE: SEA Appendix for part 28 - habitat type list and habitat value

I think if you include the caveat that ratios would be expected to increase in the event that mitigation for listed species is necessary, then I think you've addressed the Habitat Authority's concern on that item.

Thanks.

Lizette Longacre
Ecologist
Puente Hills Habitat Preservation Authority
7702 Washington Ave., Suite C
Whittier, CA 90602

-----Original Message-----
From: Joseph Decruyenaere
Sent: Thursday, April 03, 2014 3:21 PM
To: Lizette Longacre
Cc: Emma Howard; Carl Nadela; Susan Tae
Subject: RE: SEA Appendix for part 28 - habitat type list and habitat value

Hi Lizette,

Let me think about this some more and raise the discussion at my next meeting with Emma et al.

Part of the problem, I think, is that the habitat types as listed in the ratio tables are very broad. If CAGN were to be identified as being potentially impacted by a project we would be obliged to consider impacts to its habitat, and the mitigation for losses of CSS would scale up because of the imperiled nature of CAGN. However, that's not going to be the case for all types of CSS because CAGN uses a fairly narrow expression of CSS that's dominated by California sagebrush, with uncommon exceptions.

If I have any reluctance in changing the ratio it's because the ratios are supposed to represent an SEA-wide prescription which I don't think should be swayed by the dependence of CAGN on a relatively small set of a large category of vegetation associations. On the other hand, if the overwhelming majority of CSS within the SEA is of the appropriate type and can reasonably be expected to be used by CAGN, then the general prescription should reflect that. Does the PHHPA have a vegetation map of the area that shows alliances and associations? I think that would help considerably in determining the how much of the CSS in the SEA can be expected to be used by CAGN and based on that we could make a better generalization of its relative value.

I also think it would be a good idea to include a caveat in all of the ratio tables that ratios would be expected to increase in the event that mitigation for listed species is necessary, and I can bring this up with Emma et al. at our next discussion.

Thanks,
Joe

-----Original Message-----
From: Lizette Longacre
Sent: Thursday, April 03, 2014 1:56 PM
To: Joseph Decruyenaere
Subject: SEA Appendix for part 28 - habitat type list and habitat value

Hi Joe. Thanks for meeting with us yesterday and for your patience reviewing our comments and addressing our questions. We really appreciate the time and effort.

When speaking with Emma regarding the SEA, I raised a question regarding the habitat type list and habitat values assigned in the Appendix for Part 28 of the SEA. For example, under the Puente Hills SEA (#8), CSS is listed as having a habitat value of medium. Given that this habitat is critical habitat for the coastal California Gnatcatcher (CAGN), it seems like the habitat value should be high. In addition, since chaparral is a primary constituent element for CAGN, that value should be risen to medium; especially in areas in close proximity to CSS.

Please let me know the criteria used to make a valuation determination on the habitat types and if you agree with the above and will make the edits.

Thanks again.

Lizette Longacre
Ecologist
Puente Hills Habitat Preservation Authority
7702 Washington Ave., Suite C
Whittier, CA 90602

Puente Hills
Habitat Preservation Authority
Endowment Provided by the Puente Hills Landfill

HABITAT AUTHORITY
CELEBRATING 20 Years
Preservation, Restoration, and Education

April 14, 2014

County of Los Angeles
Department of Regional Planning
Attn: Emma Howard
Regional Planning Department
Room 1354
320 W. Temple Street
Los Angeles, CA 90012

Comments on the Draft Significant Ecological Area Ordinance dated March 25, 2014

Dear Ms. Howard:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the Draft Significant Ecological Area (SEA) Ordinance (dated march 25, 2014). The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq*. with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to its mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency endeavors to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority owns and or manages over 3,800 acres which lie within the Cities of Whittier and La Habra Heights, as well as in the County unincorporated areas of the Puente Hills known as Hacienda Heights and Rowland Heights.

The Habitat Authority thanks and acknowledges the Department of Regional Planning for the incorporation of certain comments on the previous SEA Ordinance Summary Draft dated June 2012, December 20, 2012 and December 5, 2013. These comments included suggested language for development standards within SEAs, such as exclusion of invasive plants, fencing to promote wildlife movement, and avoidance of habitat impacts from fuel modification. However, certain comments were not addressed in the current Draft Ordinance and are included below for reference, along with additional comments.

A Joint Powers Agency created pursuant to California Government Code §6500 *et seq.*
7702 Washington Avenue, Suite C, Whittier, CA 90602 • Phone: 562 / 945 - 9003 • Fax: 562 / 945 - 0303

Printed on recycled paper

SEA ORDINANCE

Those comments with an asterisk (*) are reiterated from a previous Habitat Authority comment letter on an earlier draft but still apply.

22.52.2910 - Applicability

1. * Subsection C.6. Please broaden the exemptions. The exemption from the SEA Ordinance noted in Subsection C.7. is for "any of the following activities required, requested, authorized or permitted by a governmental agency: (a) Removal or thinning of vegetation for fire safety or in response to an emergency; and (b) Hazard management activities in response to an emergency or other public safety concerns." We suggest that activities involving removal of non-native vegetation (including by herbicide) and habitat restoration (including, but not limited to, seeding, planting of container plants, and irrigation) also be exempted activities by open space management government agencies. We also suggest exemption of government agency activities such as scientific studies, erosion control, and construction, maintenance or demolition of trails, structures or facilities necessary for open space management activities.

22.52.2915–Permitted Uses

2. *Subsection B. Please remove all development areas on Habitat Authority property from the maps. This subsection allows for uses or projects located within developed areas identified in the SEA Development Map. However, based upon a review of the Proposed Developed Areas available through the Department's GIS-NET3, many of these mapped areas in the proposed Puente Hills SEA appear to be incorrect. Some existing fuel modification zones are mapped, and others are missing. Since fuel modification practices are exempt activities, please remove from the map all fuel modification areas that are identified as developed that are on Habitat Authority properties. Since the Habitat Authority will not be allowing expansion of development activities within fuel modification zones on lands managed/owned, this layer on the map needs to be adjusted.

3. *Subsection F. Please broaden the exemptions so public funds are not spent unnecessarily. This allows for activities conducted by governmental agencies to improve the quality of biological resources in an SEA, including non-native vegetation removal programs, native habitat restoration programs, and construction of wildlife under and overpasses for habitat linkages and wildlife corridors. It was requested earlier in this letter and in previous letters that such activities be exempt and we still make that recommendation, as they are conducted for the sole benefit of habitat improvement and generally have very minor impacts. However, if they remain as Permitted Uses requiring Site Plan Review, it is our understanding that such review would only apply to new or existing programs, and would not be required for every individual project, some of which are quite small and isolated. For example, the Habitat Authority has an existing Resource Management Plan (RMP) which includes non-native vegetation removal and habitat restoration programs; it is our understanding that the RMP could be submitted for Site Plan Review and approval, and that any subsequent activities consistent with that RMP would be permitted without individual site plan review. This would include , that activities such as scientific studies, erosion control, and construction, maintenance or demolition of trails, structures or facilities

necessary for open space management activities be exempt as requested earlier in this letter and in previous letters; If these activities are not exempt then the intent of the Ordinance may be defeated by the abundance of County staff resources necessary to follow up and make site visits that would be required per this proposed Ordinance due to the many activities of governmental land management agencies county-wide. These activities described above are integral to the management of biological resources, and often have minor impacts compared to other permitted uses such as single-family residences. The requirement for open space management activities (such as non-native vegetation removal or demolition of trails) to undergo a Site Review or Conditional Use Permit process would needlessly cost the County, and land management agencies (which are already struggling with limited resources) additional unanticipated funds which could be used for actual improvement of biological resources and would unnecessarily delay safety, maintenance, and educational management actions on properties enjoyed daily by the public. Please also consider indicating in the ordinance that the Site Plan approval has no term limits.

22.52.2925 - Development Standards This section lists the development standards non-exempt activities would need to adhere to when conducted within SEAs.

4. Subsection F. This subsection notes that new development may not narrow Connectivity Areas to a width of less than 1,000 feet at any point. Given that the spatial scale of corridors required to maintain viable populations can be partially determined by the species using that corridor, we suggest language that guides the width **and length** of Connectivity Areas to be appropriate for the suite of species, or focal species, at specific sites.

5. Subsection G. According to the development standards, new development may not narrow Constriction Areas to a width of less than 200 feet at any point. Given that the spatial scale of corridors required to maintain viable populations can be partially determined by the species using that corridor, we suggest language that guides the width **and length** of Constriction Areas to be appropriate for the suite of species, or focal species, at specific sites. For example, long corridors may not provide suitable conditions for the safe passage of animals, especially if predators are present.

6. Subsection J.2 table. Please consider adding language for the setback to clarify that when measuring the setback distance, measurements begin at the ordinary high water mark or watershed boundary.

Section 22.52.2935 –Uses Subject to Permits– Application Procedures

7. Subsection C. Please the following fourth **bold** item to identify and delineate during site review: **Special status species**

22.52.2945 –Uses Subject to Permits – Conditions of Approval or Issuance

8. *Subsection A.2.a.iii. More emphasis should be given to setting aside land that is contiguous with other preserved lands. This section prioritizes land to be provided as Natural Open

Space and gives preference to open space preserved on the same lot or parcel as the impact. This preference may not always result in the highest conservation value, especially if the resulting open space is small or isolated. Rather, preference should be given to preserving open space that is contiguous with other preserved lands, or to areas that will create or strengthen a habitat linkage or wildlife corridor. This type of strategic conservation will promote the viability of SEAs more than a piecemeal approach.

9. Subsection A.2.a.iii. (3) and (4). In addition, the Habitat Authority recommends switching priorities for numbers 3 and 4 so that Connectivity and Constriction Areas are given a higher priority for preservation as Natural Open Space. As it is important that those Connectivity and Constriction Areas have suitable habitat, restoration in those Areas should also be encouraged as part of maintaining the land in perpetuity.

22.52.2950 - Uses Subject to Permits – Findings

10. *Subsection A.3. SEA viability thresholds should be revised to better protect SEAs. This subsection lists the Findings required for the Hearing Officer or Regional Planning Commission to issue an SEA CUP. Subsection H.3 requires that a project cannot result in the loss of SEA viability, which is defined as (a) bisecting the SEA, (b) closing of a connectivity or constriction, (c) removing habitat characteristic of the SEA, (d) removing the only known location of an SEA species, or (e) removing the only known location of a new or rediscovered species. Items b, d and e provide a very high threshold for determining the loss of SEA viability. For example, the substantial narrowing of a connectivity area, not just the closing of the constriction, could result in SEA viability loss. Or the removal of key habitats or populations of certain species, not just the removal of the only known locations of that species, could also result in SEA viability loss. These SEA viability thresholds should be revised to be less limiting.

Thank you for your consideration of our comments. We look forward to reviewing the still to come sections of the Program Guide as soon as they are made available. Feel free to contact me or Lizette Longacre, Ecologist, at (562) 945-9003 for further discussion.

Sincerely,

Bob Henderson
Chairman

cc: Board of Directors
Citizens Technical Advisory Committee
Connie Chung, Los Angeles County Department of Regional Planning

ROSE HILLS
Memorial Park & Mortuary

RECEIVED
MAR 12 2014
BY:

March 11, 2014

Mr. Richard J. Bruckner
Director
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Mr. Bruckner:

Thank you for taking the time out of your busy schedule to come out to Rose Hills Memorial Park today. The Rose Hills family appreciates your continued support on our SEA designation exemption. We also look forward to hearing your interpretation of our Cemetery Permit 21-1 in a few weeks as we continue our plans to serve the communities' needs into the next 100 years. If we may be of any assistance regarding any matter related to our Memorial Park or our industry in general, please do not hesitate to contact my staff or me. Rose Hills looks forward to a continued positive partnership with your team over the many years to come.

Sincerely,

Patrick Monroe
President

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

March 26, 2014

Patrick Monroe, President
Rose Hills Memorial Park & Mortuary
3888 Workman Mill Road
Whittier, CA 90601

Dear Mr. Monroe:

APPLICABILITY OF PROPOSED SIGNIFICANT ECOLOGICAL AREAS PROGRAM TO ROSE HILLS MEMORIAL PARK

I am writing to confirm our discussion on March 10, 2014, regarding the updated Significant Ecological Areas (SEA) Program and the effects, if any, on your existing cemetery use. Per our discussion, the draft SEA Ordinance includes a provision that exempts existing uses with valid permits from the provisions of the ordinance. Therefore, as the entire Rose Hills Memorial Park property is under a valid permit, we confirm that the existing use may continue as approved without being subject to the new SEA regulations.

In addition, while undeveloped portions of your property are mapped within the proposed SEA to reflect existing valuable resources, these areas are also covered under the existing permit and new development; therefore, are not subject to the provisions of the new SEA Ordinance.

In conclusion, it is not the intent of the SEA Program, including the SEA boundary and the SEA Ordinance, to impact ongoing legally permitted uses. We appreciate the dialogue on this issue and the long-term partnership our Department has with Rose Hills Memorial Park.

320 West Temple Street ▪ Los Angeles, CA 90012 ▪ 213-974-6411 ▪ Fax: 213-626-0434 ▪ TDD: 213-617-2292

If you have additional questions or would like to discuss this matter further, please contact Ms. Susan Tae of my staff at stae@planning.lacounty.gov or at (213) 974-6476 between 7:30 a.m. and 5:30 p.m., Monday through Thursday.

Sincerely,

Richard J. Bruckner
Director

RJB:MC:SMT:eh:ems

c: Supervisor Don Knabe (Julie Moore, Andrea Avila)

K_AP_032614_L_ROSEHILLS

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

February 3, 2014

Ms. Emma Howard
County of Los Angeles
Regional Planning Department
Room 1354
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Howard:

Comments on Draft Significant Ecological Area (SEA) Boundaries and December 5, 2014, Draft SEA Ordinance Update

The Sanitation Districts of Los Angeles County (Districts) appreciate this opportunity to review and submit comments on the Draft SEA boundaries (provided on July 18, 2013, by the Los Angeles County Department of Regional Planning (Regional Planning) at http://egis3.lacounty.gov/dataportal/2011/12/12/significant-ecological-areas-sea-proposed/) and the December 5, 2014, Draft SEA Ordinance. The Districts are a confederation of 23 special districts that operate and maintain regional wastewater and solid waste management systems for approximately 5 million people residing in 78 cities and unincorporated portions of Los Angeles County.

The Districts support Regional Planning's efforts to further develop the SEA program and appreciate the boundary adjustments that were made based on out previous comments (e.g., near the Pomona Water Reclamation Plant). Our current comments are noted below. The Districts are willing to share GIS shape files of our facility boundaries to support Regional Planning's revisions to SEA boundaries.

1. Lancaster Agricultural Site. Figure 1 depicts property that Sanitation District No. 14 has developed or intends to develop for agricultural operations using recycled water. The smaller portion labeled A is a site developed with a recycled water storage tank and pump station to serve the agricultural site. We request that the SEA boundary be adjusted to exclude the red hatched areas, which are part of the agricultural site or its supporting facilities.

2. Palmdale Water Storage and Agricultural Sites. Property developed for recycled water storage reservoirs is depicted in Area A on Figure 2. As an existing use, this area should be removed from the SEA boundary or exempted as an existing use at the time the expanded boundary went into effect. Areas B and C on Figure 2 depict land purchased and designated for agricultural operations using recycled water. As these parcels were purchased as part of an approved Facilities Plan and EIR to serve a public need, we believe it would be inappropriate to add a SEA designation to this property now and potentially jeopardize the implementation of this approved public project. This request is consistent with Regional Planning's Conservation and Open Space Element Policy COS 1.4: *Promote the use of recycled water, where available, for agricultural and industrial uses and support efforts to expand recycled water infrastructure* (Chapter 4 at p.

27) of the May 2, 2013, Draft Antelope Valley Area Plan. The Districts requested these same adjustments in a comment letter dated August 30, 2007; however, the adjustments have not been incorporated in this iteration.

3. Valencia Water Reclamation Plant (WRP). The Valencia WRP is shown in Figure 3. We appreciate Regional Planning's prior efforts to retract the SEA boundary to exclude the Valencia WRP. We request small additional adjustments shown as red hatching to eliminate encroachment onto the Valencia WRP parcel. While the areas shown in green are conservation easements and will not be developed, we request that the SEA boundary not encompass those areas because the current proposed ordinance requires a SEA review process for any work on a parcel that has even a minute coverage by a SEA. Requiring such SEA reviews for an active water reclamation plant would not be in the public's best interest.

4. Calabasas Landfill. The active Calabasas Landfill is shown in Figure 4. We appreciate Regional Planning's prior efforts to adjust the SEA boundary to exclude the Calabasas Landfill. We request a slight adjustment to the proposed SEA boundary (shown hatched in red) so that the boundary does not encroach on landfill property.

5. Whittier Narrows WRP. The Whittier Narrows Water Reclamation Plant is shown in Figure 5. We request that the red hatched area be removed from the proposed SEA boundary. Without such adjustment, any work on this active WRP would require SEA review under the current proposed ordinance and such reviews would not be in the public's best interest.

6. Puente Hills Landfill. The Puente Hills Landfill is shown in Figure 6. While this landfill has stopped receiving waste, there will be ongoing maintenance and post-closure construction projects for years to come. Similar to previous comments, we request that the red hatched area be removed from the proposed SEA extents so that SEA does not encroach on landfill property and trigger SEA reviews for routine work onsite.

7. General Comment Regarding Extent of Proposed SEA Boundaries. We wish to reiterate our prior request that boundaries be drawn more precisely and exclude areas where a high percentage of the land has been developed or otherwise previously disturbed. Designating previously disturbed areas as a SEA would require users of the land to go through a site plan review. These efforts require time and resources by both the applicant and the County that are not justified given that the potential significant ecology resources no longer existing due to prior disturbance. While the intent of the Type A CUP (§22.52.2935) seems to be a less rigorous review process for such properties, we believe that the current proposed process is too burdensome. For example, the Type A CUP requires a site visit by a biologist, a determination ($503), site plan review ($945), and hearing officer review ($8,619). We believe the process should be simplified to: (1) the applicant furnishing some sort of proof (e.g., dated aerial photographs) that the portion of the property where work is to take place was disturbed prior to the date that the land was added to the SEA, and (2) Regional Planning staff reviewing the veracity of the proof.

8. Developed Area Exemption (§22.52.2915.2). The Districts agree that projects located entirely within developed or disturbed areas are appropriate permitted uses. However, to best use public resources, such projects should be exempt or required to go through a simple process to verify the location within a previously disturbed area. With the wide availability of aerial imagery including Google Street View, Bing oblique imagery, and high quality imagery available from the Los Angeles Regional Imagery Acquisition Consortium (LARIAC), applicants and County staff could usually verify the disturbed status of a parcel without physically visiting the site. As currently worded, such projects would require a site plan review which would require application

preparation, application review, and a mandatory site visit by a County biologist. These efforts require time and resources by both the applicant and the County that are not justified in most cases.

9. Public Facilities Exemption. Reference §22.52.2910. The Districts believe that public projects that have been approved and have a recorded, valid CEQA document prior to the effective date of the ordinance should be exempt where such projects were not within a SEA prior to their approval. Such projects would already have gone through a public process where the impacts to biological resources were considered and appropriate mitigation was identified. To add a new discretionary approval after a public decision to proceed with the project was already made does not seem appropriate.

10. Requiring SEA Review for Work Proposed Outside a SEA but on a Parcel Containing a SEA (§22.08.190). The existing SEA ordinance only requires a SEA review when proposed work would occur within a SEA. Under the existing process, our understanding is that the County can confirm that proposed work is outside a SEA boundary while reviewing entitlements. The proposed change that a SEA review is required whenever work is proposed on a parcel containing a SEA regardless of whether the work would occur in the SEA would create much additional cost and time impacts for SEA review while the potential benefit to the significant ecological area appears to be limited.

11. Agricultural Developed Areas (§22.52.2915.3). The 2007 draft SEA ordinance identified these regions as agricultural opportunity areas. The Districts has queried Regional Planning's on-line GIS-NET3 and determined that many of our properties designated for agricultural operations (see green hatched in Figure 2) are not identified as Agricultural Developed Areas. We request that the subject parcels either be removed from the SEA or designated as agricultural developed areas.

If you have any questions regarding this comment letter, please contact Wendy Wert at (562) 908-4288, extension 2737, or by e-mail at wwert@lacsd.org.

Very truly yours,

Grace Robinson Hyde

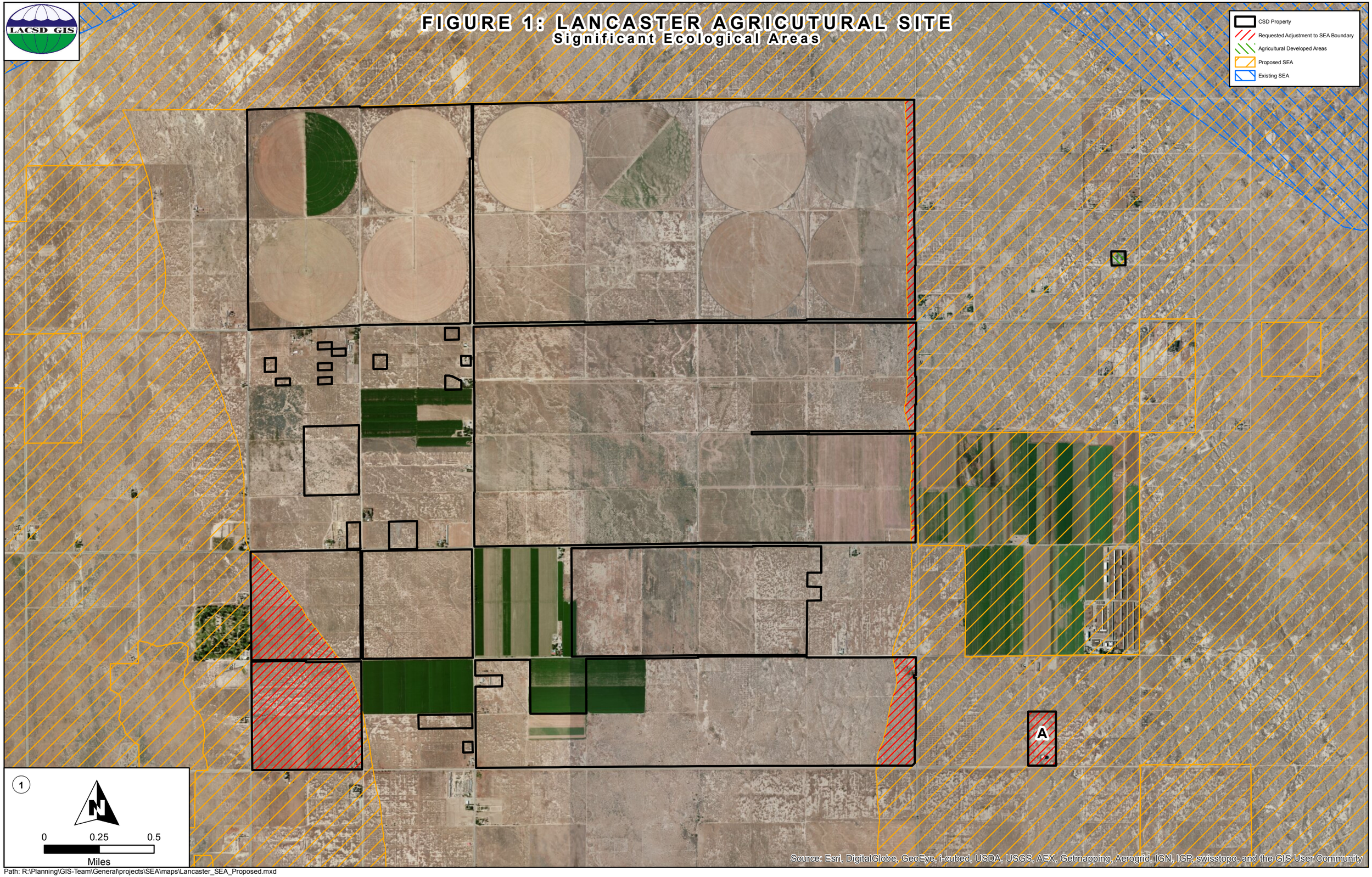
Bryan Langpap
Supervising Engineer
Planning Section

BL:WW:ddg

Enclosures

FIGURE 1: LANCASTER AGRICUTURAL SITE

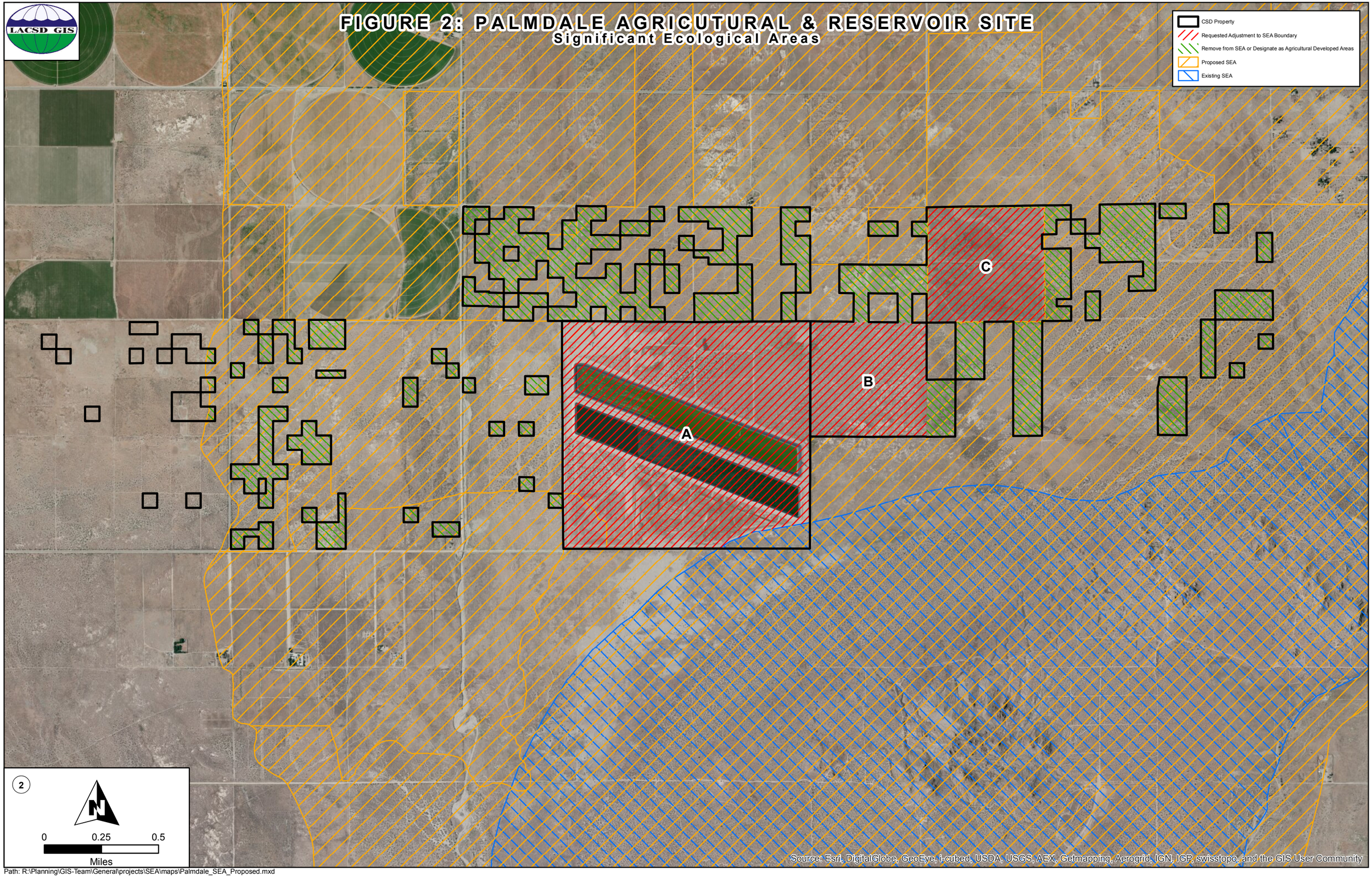
Significant Ecological Areas



Path: R:\Planning\GIS-Team\General\projects\SEA\maps\Lancaster_SEA_Proposed.mxd

FIGURE 2: PALMDALE AGRICUTURAL & RESERVOIR SITE

Significant Ecological Areas



Path: R:\Planning\GIS-Team\General\projects\SEA\maps\Palmdale_SEA_Proposed.mxd

FIGURE 3: VALENCIA WATER RECLAMATION PLANT

Significant Ecological Areas

Path: R:\Planning\GIS-Team\General\projects\SEA\maps\Valencia_SEA_Proposed.mxd

FIGURE 4: CALABASAS LANDFILL
Significant Ecological Areas

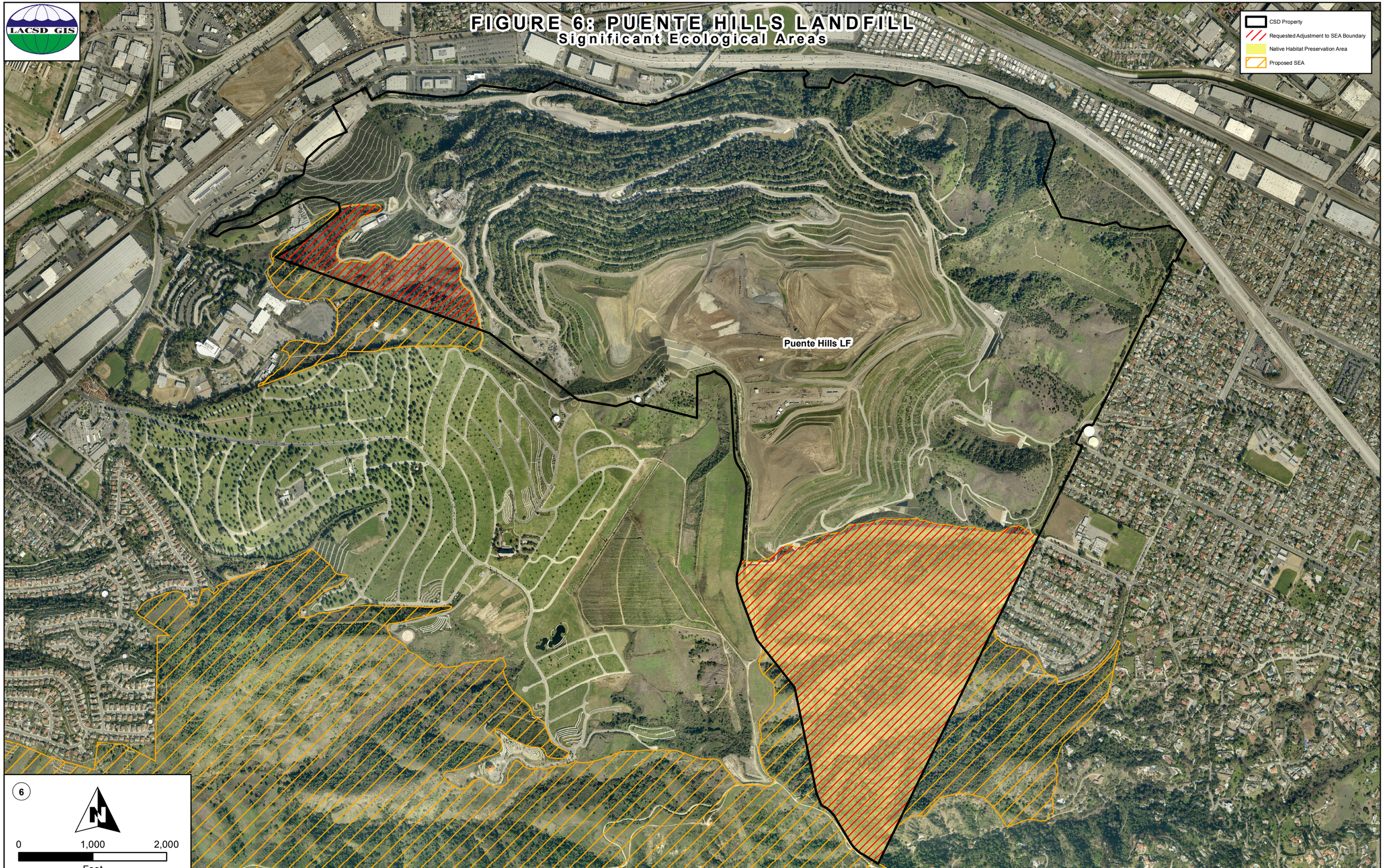
Path: R:\Planning\GIS-Team\General\projects\SEA\maps\Calabasas_SEA_Proposed.mxd

FIGURE 5: WHITTIER NARROWS WATER RECLAMATION PLANT

Significant Ecological Areas

Path: R:\Planning\GIS-Team\General\projects\SEA\maps\WhittierNarrows_SEA_Proposed.mxd

FIGURE 6: PUENTE HILLS LANDFILL
Significant Ecological Areas



Path: R:\Planning\GIS-Team\General\projects\SEA\maps\PuenteHills_SEA_Proposed.mxd

Vulcan
Materials Company
WEST REGION

MICHAEL LINTON
VICE PRESIDENT
PROPERTIES & LAND DEVELOPMENT

500 N. BRAND BLVD., SUITE 500
GLENDALE, CA 91203
TELEPHONE 818.553.8953
EMAIL LINTONM@VMCMAIL.COM

April 15, 2014

Emma Howard
Los Angeles County Department of Regional Planning
General Plan Development and Housing Section
320 W. Temple Street, Room 1354
Los Angeles, CA 90012

Re: Comments on Draft 5 of the Proposed Significant Ecological Areas

Dear Ms. Howard,

This letter was prepared in response to Draft 5 of the Los Angeles County (County) proposed Significant Ecological Area (SEA) expansion. CalMat Land Company (a.k.a Vulcan Materials Company) would like to protect the interests of their two properties located in Los Angeles County, California. Vulcan Materials Company appreciates your consideration of our comment prior to the hearing scheduled for April 23, 2014.

Vulcan Materials Company is a major producer of construction aggregates and aggregated-based construction materials in the State of California. Large quantities of aggregates are used to build and repair valuable infrastructure such as roads, bridges, waterworks, and ports, and to construct buildings such as homes, schools and hospitals.

The Vulcan Materials Company operations will be negatively affected by the proposed SEA expansion in association with the Los Angeles County General Plan Update and this letter has been written to ensure that the County has considered the potential impacts to the natural mineral resources in the area. It is imperative that the significant aggregate materials located in the Antelope Valley and Santa Clarita River Valley areas of Los Angeles County remain unaffected by the proposed SEA expansion. Our primary concerns include the following:

Vulcan Materials Company is interested in the preservation of mineral resources as well as significant natural habitat. The SEA should define the specific critical habitat areas for clarity. The sensitive species and habitat information was generalized to include a vast majority of the areas in the County—disturbed and undisturbed without a proper scientific evidence supporting the purpose for the proposed boundary expansion. The SEA Ordinance is forcing the landowner to invalidate the SEA assumptions.

The SEA is proposed to expand to include areas with low biological activity. The Vulcan Materials Company operations include areas that were historically disturbed and are currently utilized for

industrial purposes. Expanding the SEA to include these existing industrial areas and forcing potential projects to undergo more extensive review is not logical. Vulcan Materials Company requests that the County consider removing areas that possess significant mineral resources and are currently operated for industrial purposes from the proposed SEA expansion.

The proposed increased review of reclamation plans for surface mining by the Significant Ecological Areas Technological Advisory Committee (SEATAC), with the ability for SEATAC to make recommendations for the project is unreasonable. The information regarding the selection process for SEATAC members has not been presented. Vulcan Materials Company is concerned that there is potential for the review board to be unfamiliar with surface mining reclamation plans and have a possible biased anti-development agenda.

The County relies heavily on aggregate materials and demand is expected to increase in the future. Vulcan Materials Company supplies a significant amount of aggregate that is mined in this region. Vulcan Materials Company cannot relocate their operations because they rely on finite resources that are located in specific State designated mineral resource areas. The proposed SEA expansion conflicts with the State designated mineral resource areas and has negative consequences on future plans for Vulcan Materials Company to expand their operations to potentially provide for the future needs of the County.

Please do not hesitate to call me at (818) 553-8953 if you have any questions or would like to discuss. Thank you for your time and we look forward to hearing back from you.

Respectfully submitted,

Michael Linton
Vice President, Properties & Land Development

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065
TELEPHONE: (310) 589-3230
FAX: (310) 589-2408

GLENN PARKER
CHAIR
PUBLIC MEMBER
ORANGE COUNTY

MICHAEL HUGHES
VICE-CHAIR
PUBLIC MEMBER
LOS ANGELES COUNTY

BOB HENDERSON
CITY OF WHITTIER

CALIFORNIA STATE PARKS

CHRISTINE MARICK
CITY OF BREA

SANTA MONICA MOUNTAINS CONSERVANCY

DICKIE SIMMONS
LOS ANGELES COUNTY BOARD OF SUPERVISORS

JACK TANAKA
CITY OF DIAMOND BAR

JANE L. WILLIAMS
CITY OF LA HABRA HEIGHTS

February 10, 2014

Emma Howard
Regional Planning Department
320 West Temple Street, Room 1354
Los Angeles, California 90012

Draft SEA Ordinance
Released December 5, 2013

Dear Ms. Howard:

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, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. WCCA has been following the General Plan and Significant Ecological Area (SEA) development closely and provides the following comments on the draft SEA Ordinance, released December 5, 2013.

WCCA supports the inclusive proposed SEA boundaries and commends the County on applying this approach. We continue to compliment the County's efforts to propose more inclusive and biologically sound boundaries to ensure long-term sustainability of SEAs. However, a key area southwest of the Puente Hills SEA is not included in the newly proposed SEA boundaries. This area contains habitat resources for sensitive species found in the Puente Hills. WCCA recommends that the area shown on the attached map be included in the Puente Hills SEA.

Puente Hills Significant Ecological Area Boundaries

WCCA recommends the inclusion of an area east of Harbor Boulevard, in unincorporated Los Angeles County near the Los Angeles County/Orange County border (shown in the attached map). This area is part of the Aera project boundary. It serves a distinct and critical purpose in the broader integrity of the SEA by providing both habitat for coastal California gnatcatcher (*Polioptilla californica californica*) and buffer for adjacent core habitat and movement corridors. Any extensive development in this subject area would unquestionably harm the ecological integrity of the Puente Hills and potentially sever genetic connections across Harbor Boulevard. Any further substantial fragmentation of habitat in the Puente Hills would irreparably damage the biological resources WCCA is charged with protecting. Only inclusion in the SEA can provide the needed level of review and protection given the biological significance of the area.

The subject area is adjacent on several sides[1] to known populations of the federally threatened coastal California gnatcatcher.[2] The mixed native-nonnative grassland interface with coastal sage scrub provides ideal less-dense scrub preferred by the species. While dependent on coastal sage scrub within its U.S. range, the gnatcatcher regularly uses other habitats and shows seasonal and perhaps daily patterns in such use.[3] The subject area is positioned between three known occurrences, making it indisputably part of the gnatcatcher's range.

Grassland has noticeably reduced over time in the Puente-Chino Hills due to residential encroachment and the reestablishment of woody plants following the removal of grazing.[4] Vegetation patterns are dynamic and SEA boundaries should consider ecosystems in their entirety rather than static conditions. Any significant disturbance in the subject area would disrupt daily and seasonal patterns and critically threaten the viability of local gnatcatcher populations. Substantial loss of habitat in key areas in this location could irreversibly genetically isolate populations further west in the Whittier-Puente Hills.

Aside from the threatened gnatcatcher, grassland on or adjacent to the subject area is known to support breeding populations of other sensitive and declining bird species. A 1999 report on avian resources in the Puente-Chino Hills states:

> The exotic and semi-native grasslands of the Puente-Chino Hills may represent their greatest contribution to the breeding bird community of coastal Southern California, as so much of this habitat has been permanently lost to urbanization.

Subsequently, a 2000 study identified the grassland east of Harbor Boulevard on the Aera project site as one of three areas of highest conservation concern for birds in the Puente-Chino Hills region.[5] The author writes, "While smaller regions of grassland throughout the study area, such as the Whittier Hills, support a few pairs of species like the grasshopper sparrow or lazuli bunting, these and other grassland birds are abundant here." Breeding

---

[1]Glen Lukos Associates. 2005. Biota Report. Aera Master Planned Community. Significant Ecological Area 15, Tonner Canyon/Chino Hills, Los Angeles/Orange County, California.

[2]*California Natural Diversity Database.* Department of Fish and Wildlife.

[3]Campbell, K.F., R.A. Erikson, W.E. Haas, and M.A. Patten. 1998. California Gnatcatcher use of habitats other than coastal sage scrub: Conservation and management implications. Western Birds 29:421-43.

[4]Campbell, K.F., R.A. Erikson, W.E. Haas, and M.A. Patten. 1998. California Gnatcatcher use of habitats other than coastal sage scrub: Conservation and management implications. Western Birds 29:421-43.

[5]Cooper, D.S. 2000. Breeding landbirds of a highly threatended open space: The Puente-Chino Hills, California. Western Birds 31:213-234.

pairs of the following sensitive species are known to occur in or adjacent to the subject area: white-tailed kite[6], golden eagle[7], greater roadrunner, lesser nighthawk, loggerhead shrike, horned lark, rufous-crowned sparrow, blue grosbeak, grasshopper sparrow, and western meadowlark. Any substantial diminution in habitat quality on the Aera site may cause a chain reaction of instability among sensitive species populations to the west. Without SEA designation of the subject area, these grassland-dependent sensitive species are expected to become locally extirpated.

Furthermore, the County's proposed SEA to the north of the subject area covers a narrow canyon that crosses Harbor Boulevard to the west. The edge effects of the existing Shea Homes development are already diminishing the value of the corridor through which all east-west Puente Hills wildlife movement occur using the Harbor Boulevard Wildlife Underpass. Should the southern edge of this narrow corridor be similarly developed, the entire corridor will be subjected to the direct and indirect impacts of urbanization. The only way to protect the biological integrity of the movement corridor is to provide as much open space buffer as physically possible. The subject area provides ancillary habitat benefits by serving as an extensive southern buffer for wildlife using the underpass to cross Harbor Boulevard.

Although we note that the County has expanded the SEA slightly in the Puente Hills area, more gnatcatcher habitat can be protected by expanding SEA boundaries to include this key subject area. Conservation biology principles clearly warrant that additional expansion in the Puente Hills area must include the rest of the southwest corner of the Aera project property boundary. There is no biological justification for not including the subject area.

We appreciate your consideration of these comments. 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. Thank you for your consideration.

Sincerely,

Glenn Parker
Chairperson

---

[6]Ibid. Cooper notes that fewer than ten breeding pairs are known in the Puente-Chino Hills.

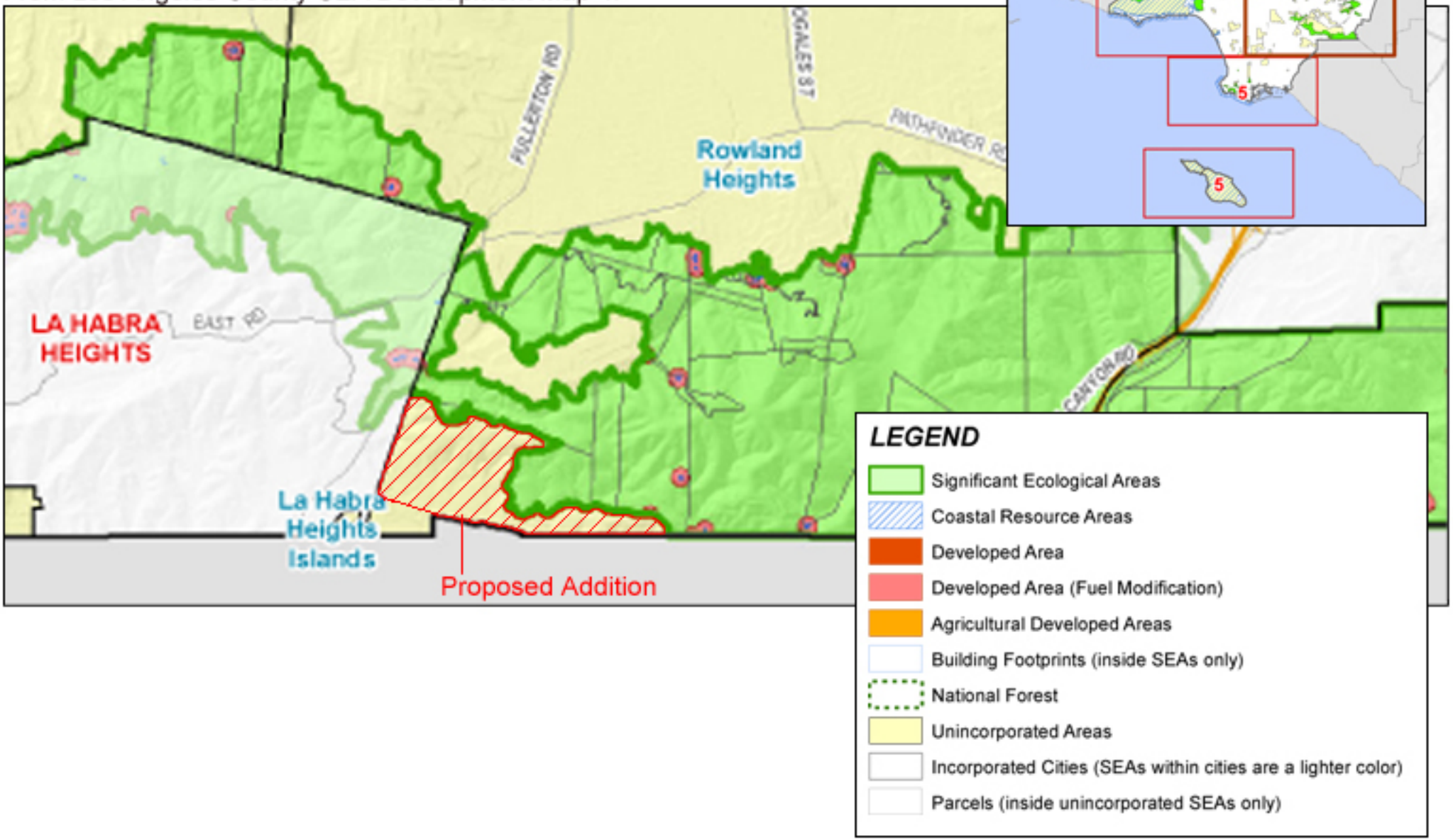
[7]Ibid. Cooper notes that only one or two breeding pairs are known in the Puente-Chino Hills.

Wildlife Corridor Conservation Authority

Proposed Addition to Puente Hills SEA Boundaries

February 10, 2014

From Los Angeles County SEA Development Map 4:



Windsor Pacific LLC
530 South Lake Avenue #810
Pasadena, California 91101
Telephone (213) 712-2357

April 11, 2014

VIA E-MAIL

Emma Howard
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, California 90012

Re: Draft SEA Ordinance

Dear Ms. Howard:

Thank you for this opportunity to comment on the draft SEA Ordinance.

Windsor Pacific LLC is the 50% owner of APN 3211-018-047, a five acre parcel in the Tick Canyon area of the Santa Clarita Valley (the "Lot APN 047").

I have used the Department of Regional Planning's GIS-NET3 Public interactive web portal to review the "Developed Areas" of the Santa Clarita River SEA. The GIS shows that many of the parcels near Lot APN 047 contain "Developed Area" but the GIS shows that no portion of Lot APN 047 contains "Developed Area". This appears to be an error.

Other lots appear to have been designated as "Developed Area" on the basis of developed homesites located on them. Perhaps the DRP was not aware that a homesite has been developed on Lot APN 047. Attached is an aerial photo from 2008 of Lot APN 047. The photo shows the homesite located on Lot APN 047, and also the homesites on some nearby lots. The homesite on Lot APN 047 should qualify as Developed Area just like the homesites on nearby lots. I can verify that the homesite located on Lot APN 047 was used as a home.

One of the nearby areas you used as the center point of a circle for a developed area is used for animal cages. If animal cages are considered "Developed Area," then a homesite for human beings, no matter how humble, should certainly be "Developed Area."

In addition, there is a large and well-maintained dirt access road that traverses the property generally from north to south. It is used by the owners of Lot APN 047 and by Southern California Edison. Southern California Edison regularly uses and grades the road, and has done so for decades, as far as I am aware. In the draft Ordinance, the term "Development" is

defined to include "any driveway, access road, street or highway." By definition, the access road is "Developed Area" and should be shown as "Developed Area."

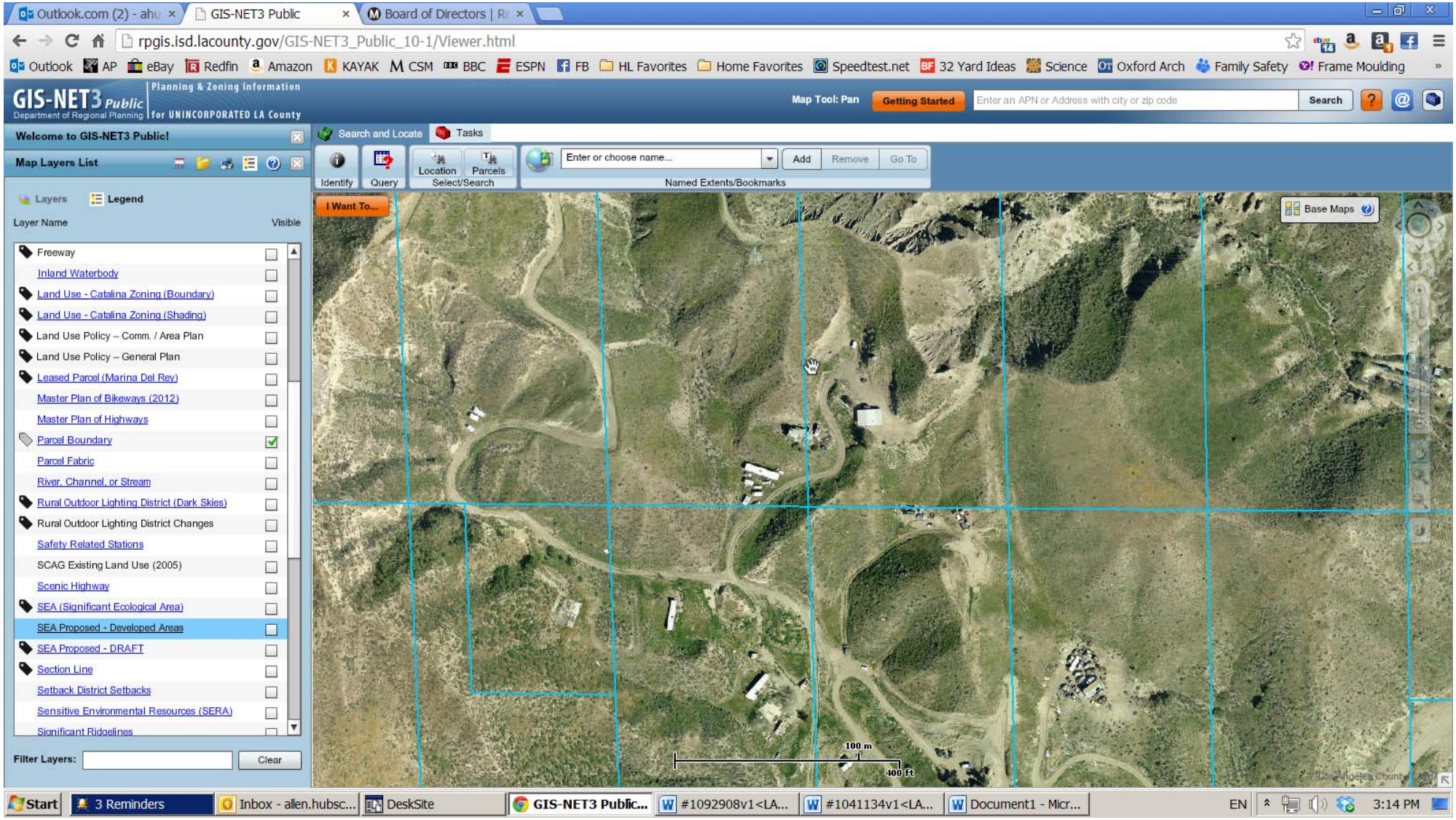
Adjacent to the access road are cut and fill areas that were graded when the access road was originally constructed. In particular, the homesite shown in the 2008 aerial photo is located where fill was placed in the canyon to accommodate a curve in the graded access road. In the draft Ordinance, the term "Development" includes "alteration to topography" and "any grading amount." This is another reason the homesite and the road on Lot APN 047 should be shown as "Developed Area."

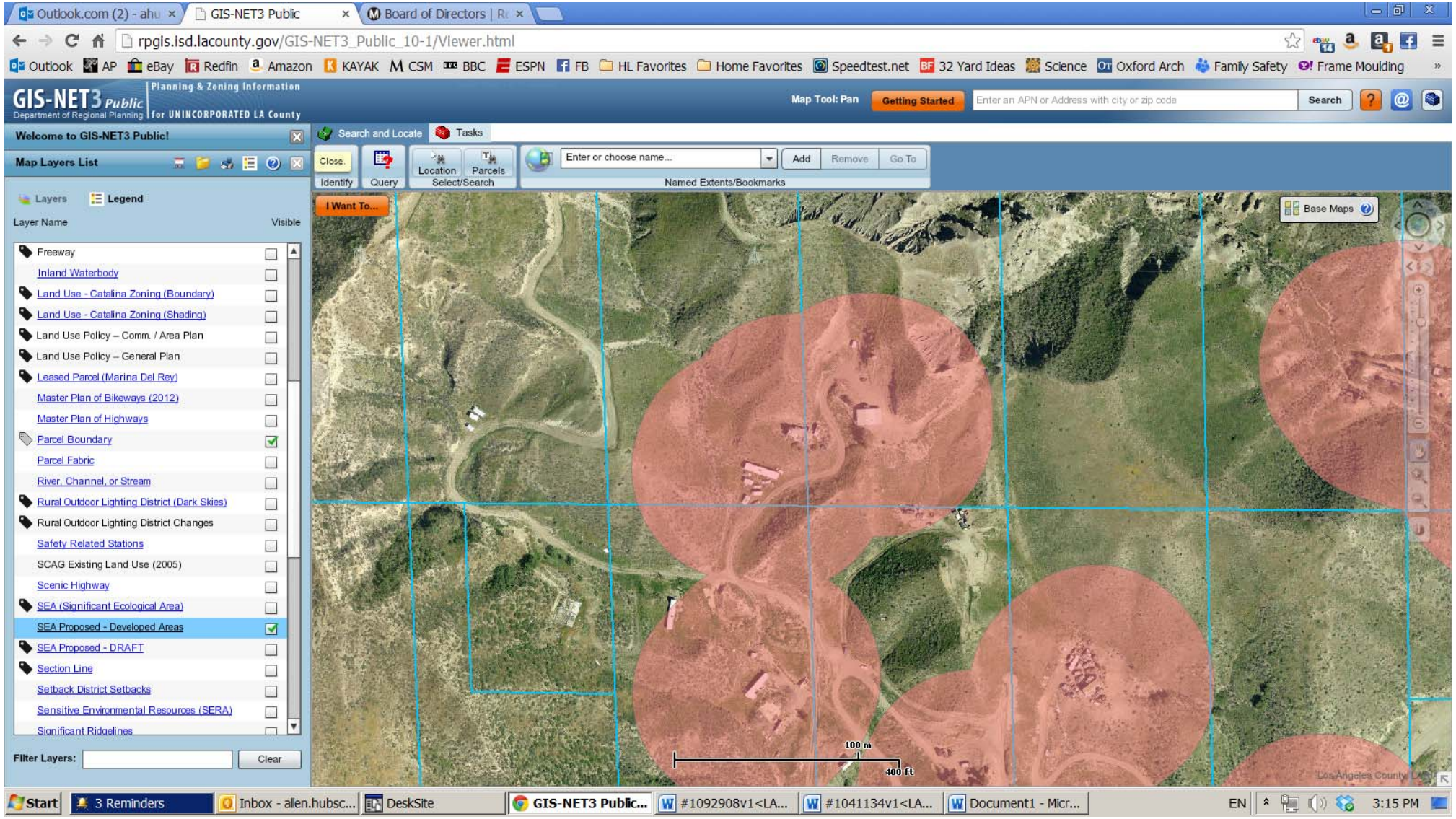
I respectfully request that you show the homesite appearing in the 2008 aerial photograph as the center point of a circle of "Developed Area" similar to the circle around nearby homesites. I also respectfully request that you clarify that the existing road is "Developed Area" along its entire length.

Thanks again.

Yours truly,

Allen W. Hubsch


Outlook.com (2) - ahu
GIS-NET3 Public
Board of Directors | R
rpgis.isd.lacounty.gov/GIS-NET3_Public_10-1/Viewer.html
Outlook AP eBay Redfin Amazon KAYAK CSM BBC ESPN FB HL Favorites Home Favorites Speedtest.net 32 Yard Ideas Science Oxford Arch Family Safety Frame Moulding
GIS-NET3 Public
Planning & Zoning Information
Department of Regional Planning
for UNINCORPORATED LA County
Map Tool: Pan
Getting Started
Enter an APN or Address with city or zip code
Search
Welcome to GIS-NET3 Public!
Search and Locate
Tasks
Map Layers List
Identify
Query
Location
Parcels
Select/Search
Enter or choose name...
Add
Remove
Go To
Named Extents/Bookmarks
Layers
Legend
Layer Name
Visible
I Want To...
Base Maps
Freeway
Inland Waterbody
Land Use - Catalina Zoning (Boundary)
Land Use - Catalina Zoning (Shading)
Land Use Policy – Comm. / Area Plan
Land Use Policy – General Plan
Leased Parcel (Marina Del Rey)
Master Plan of Bikeways (2012)
Master Plan of Highways
Parcel Boundary
Parcel Fabric
River, Channel, or Stream
Rural Outdoor Lighting District (Dark Skies)
Rural Outdoor Lighting District Changes
Safety Related Stations
SCAG Existing Land Use (2005)
Scenic Highway
SEA (Significant Ecological Area)
SEA Proposed - Developed Areas
SEA Proposed - DRAFT
Section Line
Setback District Setbacks
Sensitive Environmental Resources (SERA)
Significant Ridgelines
Filter Layers:
Clear
100 m
400 ft
Start
3 Reminders
Inbox - allen.hubsc...
DeskSite
GIS-NET3 Public...
#1092908v1<LA...
#1041134v1<LA...
Document1 - Micr...
EN
3:14 PM


Outlook.com (2) - ahu
GIS-NET3 Public
Board of Directors | R
rpgis.isd.lacounty.gov/GIS-NET3_Public_10-1/Viewer.html
Outlook AP eBay Redfin Amazon KAYAK CSM BBC ESPN FB HL Favorites Home Favorites Speedtest.net 32 Yard Ideas Science Oxford Arch Family Safety Frame Moulding
GIS-NET3 Public
Department of Regional Planning
Planning & Zoning Information
for UNINCORPORATED LA County
Map Tool: Pan
Getting Started
Enter an APN or Address with city or zip code
Search
Welcome to GIS-NET3 Public!
Map Layers List
Layers
Legend
Layer Name
Visible
Freeway
Inland Waterbody
Land Use - Catalina Zoning (Boundary)
Land Use - Catalina Zoning (Shading)
Land Use Policy – Comm. / Area Plan
Land Use Policy – General Plan
Leased Parcel (Marina Del Rey)
Master Plan of Bikeways (2012)
Master Plan of Highways
Parcel Boundary
Parcel Fabric
River, Channel, or Stream
Rural Outdoor Lighting District (Dark Skies)
Rural Outdoor Lighting District Changes
Safety Related Stations
SCAG Existing Land Use (2005)
Scenic Highway
SEA (Significant Ecological Area)
SEA Proposed - Developed Areas
SEA Proposed - DRAFT
Section Line
Setback District Setbacks
Sensitive Environmental Resources (SERA)
Significant Ridgelines
Filter Layers:
Clear
Search and Locate
Tasks
Close
Identify
Query
Location
Parcels
Select/Search
Enter or choose name...
Add
Remove
Go To
Named Extents/Bookmarks
I Want To...
Base Maps
100 m
400 ft
Start
3 Reminders
Inbox - allen.hubsc...
DeskSite
GIS-NET3 Public...
#1092908v1<LA...
#1041134v1<LA...
Document1 - Micr...
EN
3:15 PM