



August 5, 2014

Supervisor Don Knabe  
500 West Temple Street  
Los Angeles, CA 90012

General Plan Update  
Proposed SEA Expansion

Dear Supervisor Knabe

On August 6th the Regional Planning Commission will review staff recommendations for expanding the current Significant Ecological Areas (SEA) as part of the General Plan Update. The proposed SEA affecting the Aera property has been significantly expanded, with little or no biological explanation or scientific justification, to include 90% of the 2,614 acres of Aera's property at the Southeast corner of Los Angeles County.

As we understand the staff SEA review process, it consisted of a panel of experts reviewing aerial photos and offsite studies, some of which could be 20 years old. In contrast, Aera has provided the County with detailed studies and surveys that have been repeatedly updated for more than a decade. The results of these studies were originally submitted as a Biota report in 2006, and were excerpted and summarized in a submittal to Planning Staff earlier this year. They demonstrate that the Aera property a) has very few of the resources identified for SEA protection within the General Plan Update, b) that those resources are localized in a much smaller area than is included in the SEA, c) that they are largely impaired by years of grazing uses and oil operations, and d) that the resources are particularly sparse in the 947 acres proposed for SEA expansion.

We fully understand the County does not have the means to specifically analyze each property within a potential SEA, however when presented with substantial professional studies providing a comprehensive review of the site, it would seem that the County would utilize those resources as part of their decision making process. The County has done no onsite studies, and none have been cited in the bibliography. Therefore, we have to conclude that the Regional Planning Department is basing its SEA expansion proposal solely on aerial photographs and secondary sources rather than actual onsite surveys and studies. Staff has assured us on several occasions that that this is a moot point due to the fact that the Aera project is considered active and grandfathered under the current General Plan as well as the Rowland Heights Community Plan. Nevertheless it would seem logical to utilize the best available information when proposing policy decisions that will have major future impacts.

Very truly yours,

A handwritten signature in black ink that reads "Jeffrey R. Maisch". The signature is written in a cursive, flowing style.

Jeffrey R. Maisch  
Project Manager

cc: Richard Bruckner  
Curt Pedersen  
Julie Moore  
Emma Howard