

Blue Ribbon Committee

February 1, 2012

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REALTORS®

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

Re: Preliminary Draft Significant Ecological Area (SEA) and Hillside Management Area Ordinance Comments

Dear Mr. Bruckner

On behalf of our group of volunteer citizens on the Antelope Valley Blue Ribbon Committee, thank you for the opportunity to provide comments on the proposed Significant Ecological Area (SEA) and Hillside Management Area (HMA) ordinance ("Ordinance") dated November 10, 2011.

As you know the Committee has been reviewing the Antelope Valley Town & Country Plan, of which a large portion of the area is included in proposed SEA's. The dramatic increase in SEA area in the Antelope Valley, coupled with the increased requirements included in the ordinance for land set aside are of concern to the Committee.

The actual acreage of SEA's in the Antelope Valley has been proposed to increase by more than 163% to over 645,000 acres, from their current size of 245,000 acres. This excessive SEA area increase will have a significant impact on future development supporting job creation or housing in the Antelope Valley. An abundance of these large SEA overlays are on the valley floor, near city limits where the Plan's mandate encourages development. Additionally there is a perceived conflict between the Town & Country plan land use with very low densities, in scattered density patterns and the SEA biological approach to provide biotic corridors between habitats. The SEA ordinance would seem to promote a clustering of development and the Town & Country Plan promotes development that is spread throughout the Valley at a 1/10, 1/20 and 1/40 du/acre density. The Committee perceives this conflict will confuse property owners wishing to utilize their property and make it more difficult for staff to consider applications for development and increase the time it will take to consider applications or CUPs.

The Committee feels this issue between the T&C Plan and the SEA ordinance must be resolved prior to adoption of either document.

Additionally, the draft Ordinance severely limits the land owners use and/or development of the property if it is located in an SEA or HMA:

- Section H, subsection 3. Proposed Open Space, a. Preservation Instrument: "...requires the open space to remain as permanent open space in perpetuity and extinguishes all development rights."

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- Section F, Development Standards and Guidelines, 1., Dedicated Open Space Requirement, a. "at least 70 percent of the gross area of the lot(s) within a Non-Urban or Rural land use designation shall be permanently dedicated open space. At least 25 percent of the net area of the lot(s) within any other land use designation shall be permanently dedicated open space."

Currently, there may be Restricted Use Easements on property, where the owner is restricted from developing this portion of the property. However, the new regulation requires the land owner to permanently dedicate 70% of the property as maintained Open Space.

The Committee also understands the increase in SEA size includes transitional areas for the biotic habitats. These transitions may or may not currently be used, or provide a corridor from one habitat to another. We respectfully request these areas be removed from the SEA's and that they be studied on a project by project basis and required only if listed species are found in the area, or to be utilizing a corridor between habitats.

Finally, Section D, 2., d., of the Ordinance requires the maximum square footage of structures in the SEA/HMA on a lot may not exceed 4,000 square feet without at CUP. In an area where many live a rural lifestyle, this will not accommodate a home plus a barn for livestock. Consideration should be given to increase the allowable square feet, based on acreage/lot size, not simply per lot, without a CUP.

In closing, the Committee is concerned with the vast expansion of the SEA areas in the Antelope Valley as well as the additional requirements imposed on land owners in these areas. This Ordinance coupled with the new Rural Land use designations and proposed restrictions in the AV Town & Country Area Plan removes much of the County's undeveloped land from the market, and does nothing to address the current or future jobs housing imbalance in the Antelope Valley. We look forward to working with Regional Planning on revisions to this ordinance.

Sincerely,


Harvey Holloway
Co-Chair


James Vose
Co-Chair

Cc: Supervisor Antonovich
Edel Viscera
Norm Hickling
Emma Howard