

## PRINCIPLES FOR ADJUSTING SEA BOUNDARIES

### History of the SEA Map Update Process

The proposed Significant Ecological Areas (“SEA”) and Coastal Resource Areas Map (“SEA Map”) is a draft map proposed under the Los Angeles County 2035 General Plan, which is an update the County’s General Plan. This map updates the existing adopted County SEA, which was first established in 1980. The first draft of the SEA Map was released for public review in January 2001, as final recommendations of the Los Angeles County Significant Ecological Area Update Study 2000 (“2000 SEA Update Study”). The 2000 SEA Update Study, prepared by PCR Consulting, had three purposes: “[t]o evaluate existing SEAs for changes in biotic conditions and consider additional areas for SEA status within unincorporated Los Angeles County; to delineate SEA boundaries based upon biotic evaluation; and to propose guidelines for managing and conserving biological resources within these areas.”<sup>1</sup>

The 2000 SEA Update Study established the basic principles used to determine which area belong within the SEA Map:

“In general, the boundaries chosen conformed to natural topographic features; however, man-made features and artificial boundaries were used where they coincided with appropriate biological limits. Where SEAs required additional protection from adjacent land uses, buffer zones were mapped to protect watershed units or to provide distancing from noise, light, traffic and other development impacts. However, the majority of the original SEAs were thought to consist of more or less self-contained units, not in need of additional buffering.”<sup>2</sup>

“Delineation of the outer boundaries of the proposed SEAs considered many factors. In general they were drawn to include those areas that met the designation criteria and the sustainable biological unit of which they are a part. Most development and other disturbed areas that occurred along the edges of these units were excluded from the SEA. Within the interior of proposed SEAs, only large developments were excluded.”<sup>3</sup>

---

<sup>1</sup> Nelson, Steven. 2000. *Los Angeles County Significant Ecological Area Update Study 2000 Background Report*. PCR Services Corporation, Los Angeles: iv

<sup>2</sup> Nelson. 2000. 4

<sup>3</sup> Nelson. 2000. 16

“The criteria used to designate SEAS changed only slightly, but their application was made at a greater scale reflective in part of the changes that have occurred within and around the existing SEAS in the past 25 years.”<sup>4</sup>

Between 2001 and 2011 Department of Regional Planning further refined the SEA map draft generated in the 2000 SEA Update Study. This refinement included multiple public outreach rounds, including additional circulation of draft maps with each subsequent release of draft General Plan materials. In 2002 a proposed SEA map was publicly released as part of the 2002 Draft General Plan Initial Study. In 2005, following additional public comment and outreach, the SEA map was again revised after additional supporting field work and literature review. This work resulted in updated support materials released by PCR Services and revisions to the SEA boundaries made by DRP staff biologists and consulting biologists. In 2007 the next public release of the Draft General Plan included a revised SEA map, and again in 2008, the Draft General Plan was released with an updated SEA map. During this time changes made to the SEA boundaries were made in consultation with staff biologists and environmental consultants hired to work on the SEA Program Update.

In 2010, an expert panel of biologists convened to review the draft SEA Map. Using species databases and over 200 maps with high resolution aerial photography of the proposed SEAs, they compared the proposed boundaries with their own expert knowledge and provided recommendations on the SEA boundaries based on the SEA criteria and program methodology. Additional locations were identified in 2010 as areas that warranted the SEA designation. There were no recommendations to reduce the SEA boundaries. All recommendations by the panel to the County were considered, and many were incorporated into the SEA Program.

#### Further Refinement of the SEA Maps: November 2011 to July 2014

In November of 2011, the Department of Regional Planning (“Department”) released an updated draft of the SEA Map to coincide with the release of the first draft of the updated SEA Ordinance. Following the 2011 SEA Map release, the comments staff received which requested boundary changes and adjustments, were compiled and tracked in order to ensure that the recommendations and subsequent adjustment to these final comments would be reviewed, and disclosed as part of this public hearing process.

As staff reviewed the comments received against the methodology established in 2000, they made notations which further refined the methodologies. Changes to the SEA Map and SEA Program, such as the creation of a separate SEA Development Map, to replace the previous map category of Ecological Transition Area; and creation of the category of “Coastal Resource Areas” to indicate areas on the SEA Map which were within the California Coastal Zone also created changes in how the maps would be used. These changes and refinements are explained within this document, in order to establish and explain how the Department evaluates requests for SEA boundary adjustments.

---

<sup>4</sup> Nelson. 2000. 19

### SEA Boundary Map Adjustment Process

There are four categories of recommendations for adjusting the SEAs. The first two categories are either to remove or add areas to the SEA Map itself. The third and fourth categories are adjustments to the SEA Development Map, a map created in 2013 that is intended to reflect existing developed areas within the SEAs so that those areas may apply for streamlined processes under the SEA Ordinance.

Although these adjustment principles are applied uniformly, the SEAs mapping process is based on context. On rare occasions, staff may still recommend altering the SEA Map in a way that is not entirely consistent with this methodology if the site-specific circumstances support the adjustment. For any such adjustment staff will justify and disclose the reasons behind their recommendation and allow for public review.

#### REMOVAL FROM SEAS:

##### Removal of properties entirely within the SEAs in unincorporated Los Angeles County:

Only large areas of contiguous urban development (such as subdivisions, buildings, roads and parking lots) of 40 or more acres in size were excluded from the SEAs. Agriculture, grazing and renewable energy structures, such as wind turbines and solar panels are not considered under this category of contiguous urban development.

All development within SEAs may be considered for inclusion in the SEA Development map as an alternative to removal from the SEA designation.

##### Removal of properties entirely within the SEAs in in cities:

The methodology established for SEAs located in incorporated Los Angeles County under the 2000 Update study states:

“Significant Ecological Areas located within cities were not studied, though this analysis recommends that the boundaries of these areas be retained.”

“From a jurisdictional standpoint, portions or all of many SEAs were actually designated within cities incorporated prior to 1976. In addition, portions or all of several other SEAs became part of city jurisdictions incorporated since 1976. While some of these cities do not formally recognize SEAs by this title in their General Plans and Zoning Ordinances, others afford some degree of sensitivity through open space designations and protective grading guidelines.”<sup>5</sup>

“Those SEAs entirely within incorporated cities were to be retained without further study or modification<sup>6</sup>”

---

<sup>5</sup>Nelson. 2000. 8

<sup>6</sup> Nelson. 2000. 17

A request to remove parts of an SEA within a city's jurisdiction will be granted if the SEA is developed in a contiguous 40 acres, or if the entire portion no longer meets any criteria for designation.

Portions of incorporated SEAs which are preserved as open space, or are not currently developed will not be removed from the SEAs.

Removal of portions along the boundaries of SEAs in unincorporated Los Angeles County:

A request to adjust the boundary of the SEA will be considered along the edge of an SEA for properties of any size. Staff will recommend adjusting the edges of the SEA under the following circumstances:

1. To better align with natural features.

The boundaries of SEAs primarily follow natural features such as, but not limited to:

- Watersheds and subwatersheds
- Ridgelines
- The edge of naturally occurring vegetation or tree driplines
- Streams and other watercourses
- FEMA designated floodplains, and other water flow designations

The SEAs were mapped to follow these resources. Where comments have requested we will examine if we can adjust these more precisely and reflect any potential changes to these areas.

2. To exclude permanent developed areas:

The boundaries of SEAs primarily exclude developed areas, such as, but not limited to:

- Structures
- Paved areas
- Paddocks or recreation areas

The following areas of development have not been excluded from the edges of SEAs.

- Unpaved roads or unpaved road shoulders.
- Water tanks or other free standing structures where located within natural areas

On a case by case basis, landscaped areas, such as golf courses, picnic areas and cemeteries along the edge of SEAs will generally be excluded from the SEA.

If staff does not support excluding a landscaped area at the edge of the SEA boundary, the reason for retaining it must be stated clearly. Instances where a landscaped area may be retained at the edge of an SEA would include landscaping that is mixed with native vegetation or heritage or oak trees or oak woodlands, landscaping maintained by an environmental group, or other group which does not wish it to be removed from the SEA, or landscaping at a narrow point in an SEA which forms the only point of connection to another portion of the SEA.

Removal of portions along the boundaries of SEAs in cities:

Requests to adjust the boundary of the SEA will be considered along the edge of an SEA for properties of any size. Staff will consider requests to adjust the edges of SEAs in incorporated cities using the same principles used in unincorporated Los Angeles County.

ADDITIONS TO SEAS:

Additions that would create new or non-contiguous area of SEA in unincorporated Los Angeles County:

In unincorporated Los Angeles County staff will recommend adding a new SEA only if the proposed area is currently owned by a conservancy, or is the property of a local, state or national government or government agency and meets at least one of the following:

- The area is preserved for open space or conservation
- The property owner has requested the addition
- The area meets at least one SEA Criteria
- The area is beneficial to the SEAs as a whole. I.E. areas which are too small in size or do not have necessary connectivity will not enhance an SEA. Areas which meet the SEA criteria but are not recommended for addition to the SEA must be accompanied with an explanation of why the area is not beneficial to SEAs

Additions that would create a new or non-contiguous area of SEA in cities:

Staff will not recommend adding entirely new SEAs in incorporated Los Angeles County to the proposed SEA Maps. See information above under “properties entirely within the SEAs in cities”.

Staff notes that requests have been received for locations of high biological value in cities. Some of the areas are entirely composed of preserved open space. However as the past mapping methodology generally did not spend focus on reviewing SEA locations in incorporated portions of Los Angeles County, as the County does not have primary land use jurisdiction over these areas. The proposed SEAs within incorporated Los Angeles are historical SEAs, and were adjusted in 2000 primarily to increase mapping precision. Staff has focused on adding areas where the County retains land use jurisdiction over the SEAs.

However, staff would recommend that areas with demonstrated biological value such as these might be appropriate to re-examine after the SEA Program and General Plan Updates are adopted during the biannual report on the status of the SEAs, and might make excellent candidates should the principles of SEA designation be changed in the future.

Additions that would adjust properties partially within the SEAs in unincorporated Los Angeles County:

Staff will recommend adjusting the edges of SEAs to include more SEA areas using the same process established under the removal standards established above for properties partially within the SEAs.

On a case by case basis, staff will recommend adjusting the edges to include larger parcels along the edges if they have been preserved for open space or conservation, the property owner has requested the addition or the property belongs to a government agency and the area is beneficial to the SEA.

Additions that would adjust properties partially within the SEAs in cities:

Proposals for adjustments to the edges of SEAs within cities will be considered where they are contiguous to, or within existing historic SEAs and are made up of land preserved for open space use. These recommendations will be made on a case by case basis only.

**SEA DEVELOPMENT MAP ADJUSTMENTS:**

The SEA Development Map is established under the draft SEA Ordinance as an implementation tool. This map is intended to serve as a “living” map; a map that is continuously updated to reflect the status of development within the SEAs. Additional methodologies and processes for that update are forthcoming under the SEA Program Update and will be included in a separate document. The adjustment methods contained within this document may be modified and superseded by those future materials.

Additions to the SEA Development Map:

Staff will add areas which are developed or in use to the SEA Development Map if a comment identifies an area which is not currently on the map and staff can confirm the area is currently developed using either the most recent aerial photography available or a visit to the site.

Removals from the SEA Development Map:

Staff will remove the following areas from the SEA Development Map if requested:

- Removal from the SEA Development Map may be requested by a conservancy group for development on their properties. Mapped brush clearance areas will be removed, and other areas will be considered on a case-by-case basis.
- Removal from the SEA Development Map may be made where developed areas are shown overlapping onto a neighboring parcel, to better reflect the legal right to develop in those areas.
- Removal may be requested where the mapped development indicates a temporary use.
- Illegal uses may be removed from the SEA development map.
- Unpaved roads may be removed from the SEA Development map