

Blue Ribbon Committee

August 1, 2012

Committee Members

Harvey Holloway, Co- Chairman

James D. Vose, Co-Chairman

Wayne Argo

Karen Bryan

John Calandri

Jackie Fisher

Forrest McElroy

Greg Medeiros

Regina Rossall

Betty Smith

Craig Van Dam

Johnny Zamrza

Elected Officials

Senator

Sharon Runner

Assemblyman

Steve Knight

Associations

BIA - Building Industry

Association

Los Angeles Ventura

Chapter

Greater Antelope

Valley Association of

REALTORS®

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

Re: Blue Ribbon Committee Comments on the *SEA Ordinance Summary Draft, June 2012; and SEA Ordinance Change Comparison Chart, June 2012*

Dear Ms. Howard:

Thank you for spending time briefing the Blue Ribbon Committee (BRC) last month on the draft ordinances listed above, and for the opportunity to comment on the proposed ordinance changes. As stated at our briefing, this draft updates the November 2011 *Preliminary Draft Significant Ecological Areas & Hillside Management Conditional Use Permit Ordinance*. Furthermore, you indicated, this draft provides more of a framework for the proposed future ordinance, and does not include the details which must be provided in a final 'approvable' ordinance. As such, the comments provided are reflective of this draft framework and it is understood that additional drafts will be provided for public assessment and comment.

With this in mind, the BRC members believe you have made positive steps in modifying what is an onerous process, by providing development standards for Permit Exempt Uses in SEA's, an approach that will, in turn, exempt certain projects from the SEA permit approval process; thus simplifying the SEATAC process for these projects.

One major area of concern for the BRC is the prolific expansion of the SEA's within the Antelope Valley Area Plan (AVAP). These areas have more than tripled overall in the County, with the use of the corridor concept for biota, and increased the Antelope Valley SEA's by more than 5 times what is currently designated. Additionally, areas previously within an SEA could be studied and if no habitat was shown, the area could be removed from the SEA. The new Ordinance and maps require additional areas be included in the SEA's, with no opportunity for new biological studies to refute its inclusion in the SEA.

Another area of concern for the BRC is how all the individual elements of the County General Plan update, including the AVAP and ordinances, will work together in the implementation process. Each of these individual elements, such as the SEA Ordinance, has a specific impact and effect on various properties in the vast area of the Antelope Valley; where the majority of the total increase in the proposed SEA's occurs. As a result the SEA Ordinance should be included in the AVAP and approved as a portion thereof.

It is imperative that a direct, simple and transparent delineation of provisions contained within all of these programs, processes and proposed ordinances be provided to the public, in aggregate, so we may understand both the individual and the cumulative impacts and benefits of the County's proposed changes.

44903 10th Street West, Lancaster, California 93534

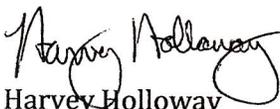
The BRC strongly suggests the Department create a matrix to clarify the provisions of the various ordinances which regulate the development of property, so that one understands the impacts of, for example: a property located in the proposed RL 20 land use designation, within a newly proposed SEA, and within a Hillside Management Area. This would be most illuminating and helpful to all parties, given the fact that these disparate elements affect property uses jointly, but as currently proposed they may not be reviewed in aggregate for their cumulative requirements.

As briefly outlined at our meeting, the BRC is considering recommending establishing Conservation Opportunity Areas and Growth Opportunity Areas in the Antelope Valley. Within the Conservation Opportunity Areas there will be incentives provided to property owners regarding the sale of their development rights. It appears to the BRC members that such an approach may ease the burden on property owners, while equally achieving the environmental conservation objectives espoused by the SEA program. Having the above-noted matrix will enable both the Department and the BRC to understand the benefits and drawbacks of this proposed approach to SEA conservation. Additionally, this approach will provide property owners with information on the economic value of participating in the proposed program.

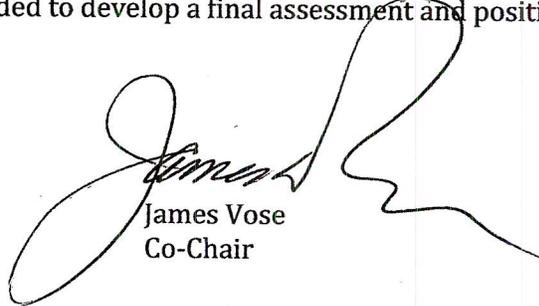
As noted previously, it is imperative that all elements from the County's General Plan and implementation program be available for review, in aggregate, *prior* to approval of the separate parts. The BRC hereby requests that this suggestion be acted upon so both the general public and decision-makers are better able to understand all of the proposed changes.

Again, we appreciate the opportunity to comment on the framework of this Ordinance, however, the BRC is unable to fully comment on its requirements due to the very brief nature of the draft presented. The BRC cautions the Department that in order to discuss and fully understand the proposed SEA ordinance, a more complete draft must be provided to develop a final assessment and position.

Sincerely,



Harvey Holloway
Co-Chair



James Vose
Co-Chair

Cc: Supervisor Michael D. Antonovich, 5th District
Edel Vizcarra, Planning Deputy, 5th District
Norman Hickling, Deputy to Supervisor Michael D. Antonovich
Richard J. Bruckner, Director, LA County Department of Regional Planning