



*protecting and restoring natural ecosystems and imperiled species through  
science, education, policy, and environmental law*

***submitted via email and USPS***

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**RE: Comments on the Draft SEA Connectivity and Constriction Map – April 2014 and Significant Ecological Areas Ordinance Update – Draft 5**

Dear Ms. Howard,

On behalf of the Center for Biological Diversity's (Center) 775,000 staff, members and online activists we submit the following comments on the Draft SEA Connectivity and Constriction Map – April 2014 and Significant Ecological Areas Ordinance Update – Draft 5. The Center is a national, nonprofit organization whose mission is to protect and restore endangered species and their habitats through science, policy, education, advocacy, and environmental law. Many of the Center's members and supporters reside in Los Angeles County and have a keen interest in retaining the incredible biological diversity that remains in Los Angeles County. The Center's members and staff regularly visit publicly accessible lands within the SEAs for purposes of research, photography, hiking, enjoyment of these rare areas and other recreational, scientific, and educational activities.

We support the update of the identification of SEAs and the ordinance to better protect the rare and endangered species and habitats that call Los Angeles County home. We offer the following comments on the Draft SEA Connectivity and Constriction Map – April 2014 and the Significant Ecological Areas Ordinance Update – Draft 5.

**Draft SEA Connectivity and Constriction Map – April 2014**

We generally support connecting important wildlife habitat areas through wildlife linkages and connectivity corridors. Under Draft 5 of the SEA Ordinance, the Connectivity Areas are proposed to be between 1500-700 feet in width and the Constricted Areas only 700 feet or less (SEA Ordinance Draft 5 at pg.4 and 5 respectively). These proposed widths for the connectivity and constriction linkages do not align with the most recent conservation biology science. Different species require different connectivity designs. Current connectivity designs rely on connectivity strands of 2 km to minimize edge effects and support long-term occupancy of the corridor by less-mobile species that may require generations to move their genes between "core areas". For many species, a wide linkage helps ensure availability of appropriate habitat, host

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plants (e.g., for butterflies), pollinators, and areas with low predation risk. In addition, fires and floods are part of the natural ecological regimes and a wide linkage allows for a semblance of these natural processes to operate with minimal constraints from adjacent development areas. Wider linkages also enhance the ability of the biota to respond to climate change, which is essential to consider in planning these days, and buffer against edge effects. Therefore, we request that where connectivity is not already constrained by existing development, that the scientifically supportable linkages be identified to achieve the goals of the SEA program. This approach is particularly viable and important in the northern part of the County, where corridors and linkages are still currently available to be preserved. Their establishment now will sustain the existing conservation investments over the long-term.

Indeed the County should incorporate the work that has been done by independent scientists on connectivity in Los Angeles County, including the work by SC Wildlands which identified key connectivity corridors in the following areas:

- South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion <sup>1</sup>
- South Coast Missing Linkages: A Linkage Design for the Santa Monica-Sierra Madre Connection<sup>2</sup>
- South Coast Missing Linkages: A Linkage Design for the Sierra Madre-Castaic Connection<sup>3</sup>
- South Coast Missing Linkages: A Linkage Design for the San Gabriel-Castaic Connection<sup>4</sup>

While we recognize that some of these key linkages have been captured by the proposed SEAs, not all of them have been.

### **Significant Ecological Areas Ordinance Update – Draft 5**

The Draft 5 SEA Ordinance (Draft 5) is a good first step to assist in maintaining Los Angeles County’s world-class natural heritage. We support many of the land use planning proposals discussed in the Endangered Habitats League letters dated February 3, 2014 and February 21, 2014 and urge the County to incorporate similar measures as San Diego County into the planning process including density limits and clustering, which appear to be lacking in Draft 5.

We offer the following document specific comments:

**Pg. 8** – “Removal or thinning of vegetation for fire or public safety,...”. Where clearance of vegetation is needed for fire or public safety, these areas need to be identified as part of the “developed” area, and included in the project “footprint” because thinning of vegetation often results in degradation of habitat from non-native plants and often causes “type conversion” to another vegetation type over the long-term. It appears this issue may be addressed on Pg 16 which states “New structures and infrastructure requiring areas of brush clearance shall not be located in such a way that any portion of the required areas includes dedicated open space areas

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1 <http://www.scwildlands.org/reports/SCMLRegionalReport.pdf>

2 [http://www.scwildlands.org/reports/SCML\\_SantaMonica\\_SierraMadre.pdf](http://www.scwildlands.org/reports/SCML_SantaMonica_SierraMadre.pdf)

3 [http://www.scwildlands.org/reports/SCML\\_SierraMadre\\_Castaic.pdf](http://www.scwildlands.org/reports/SCML_SierraMadre_Castaic.pdf)

4 [http://www.scwildlands.org/reports/SCML\\_SanGabriel\\_Castaic.pdf](http://www.scwildlands.org/reports/SCML_SanGabriel_Castaic.pdf)

on the lot or parcel of land or on adjoining or adjacent lots or parcels of land. In addition, such structures or infrastructure shall not be located in a way that any portion of the required areas of brush clearance will include undisturbed natural areas on adjoining or adjacent lots or parcels of land.” However, greater clarity should be provided between these sections.

**Pg. 16** – Construction. We believe additional state and federal regulations need to also be included, including but not limited to:

- Section 1600 et seq. permits (Streambed Alteration Agreements);
- Section 2081 Permit (State-listed endangered species);
- Regional Water Quality Control Board (RWQCB) permits;
- Waste Discharge Requirements;
- National Pollutant Discharge Elimination System (NPDES) Construction General Permit; and
- General Construction Stormwater Permit (Preparation of a SWPPP)

**Pg. 28** – The unnamed table that describes the “Percent Area of Entire County SEA Proposed By Development Proposal” and the “Acreage Value” needs to be rethought. Under this scenario, for large SEAs, multiple small projects would require no or very few acres of natural open space to be set aside. Cumulatively, these projects could significantly degradation of the SEA – death by a thousand cuts scenario. Fragmentation of habitat is one of the leading factors in habitat degradation and species elimination and the proposal as written could result in destroying the very resources it set out to protect.

**Pg 28-29 iii. 1-5** – Folding in basic conservation biology tenets into this section would better achieve the purpose for which the SEAs are established. Basic tenets include:

- Species well distributed across their native range are less susceptible to extinction than species confined to small portions of their range;
- Large blocks of habitat, containing large populations are better than small blocks with small populations;
- Blocks of habitat close together are better than blocks far apart;
- Habitat in contiguous blocks is better than fragmented habitat;
- Interconnected blocks of habitat are better than isolated blocks;
- Populations that fluctuate widely are more vulnerable than populations that are more stable;
- Disjunct or peripheral populations are likely to be more genetically impoverished and vulnerable to extinction, but also more genetically distinct than central populations<sup>5</sup>

These basic tenets become even more important in the context of climate change, where all species need to have the opportunity to try to move and adapt to the changing climatic conditions.

**Pg. 36 – Appendix for Part 2B.** This appendix treats chaparral as a single plant community, when indeed chaparral is a series of complex and varied plant communities. The appendix does recognize redshank chaparral as a unique type of chaparral, but there are others. We urge the County to recognize other types of chaparral and focus conservation on the unique ones. As the

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<sup>5</sup> Noss et al. 1997. Science of Conservation Planning. Island Press, Washington D.C. pgs. 93-104.

County is aware, frequent fire “type converts” chaparral (often into non-native plant communities), so maintaining a diversity of “old growth” chaparral, mid-aged and “young” chaparral will not only provide a mosaic of chaparral habitats for species in the county, but also retain the diversity of chaparral age-stands found in Los Angeles County.

Regarding the red shank chaparral, this unique chaparral type reaches its northern most edge of its range in Los Angeles County. These peripheral populations at the northern edges of their ranges are unique and of great importance especially as climate change models predict migration will be needed to higher latitudes and elevations.

Also in the Appendix, the coastal sage scrub community is rated as “medium habitat value”, when indeed coastal sage scrub has been highly impacted from development, invaded by non-native species and is home to some of the most rare species in the County. Coastal sage scrub has been the focal habitat for all of the Natural Communities Conservation Plans in coastal southern California because it is a highly imperiled habitat type and the ordinance will be improved by reflecting the status of this important and declining plant community.

### **Conservation Planning**

While it remains unclear if the County will be signatory to the Desert Renewable Energy Conservation Plan (DRECP), we know the County has been a participant in the planning process. We also believe that the County’s existing and proposed SEAs are very likely to be included as conservation areas under the DRECP. Therefore adopting appropriate planning now to facilitate conservation is timely.

While we recognize that much of Los Angeles County has been converted to development, the remaining areas become that much more valuable to retain and showcase the County’s rich natural heritage. Thank you for the opportunity to comment on these issues. Please keep me informed of issues related to this process at the contact information above.

Respectfully submitted,



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