CITY *of* CALABASAS

July 29, 2014

Ms. Connie Chung, AICP
Department of Regional Planning
County of Los Angeles
320 West Temple Street, Room 1356
Los Angeles, CA 90012

Re: Los Angeles County General Plan -- Public Review Draft

Dear Ms. Chung:

The draft General Plan Update for Los Angeles County includes an aggressive enlargement of the County's Significant Ecological Areas program. Fundamental to this is a new set of SEA maps which portray far more expansive SEA territories, to include a greatly expanded Santa Monica Mountains SEA. This aspect of the draft new plan needs to be more carefully explored, and the proposed Santa Monica Mountains SEA in particular should be more carefully mapped to not include properties which clearly fail to contribute to the SEA.

According to the Los Angeles County General Plan, Public Review Draft (page 127), a Significant Ecological Area (SEA) designation is:

> *"...given to land that contains irreplaceable biological resources, as detailed in Appendix E. Cumulatively, the 21 SEAs and nine Coastal Resource Areas (CRAs) represent the wide-ranging biodiversity of Los Angeles County, and contain its most important biological resources. Each individual SEA is sized to support sustainable populations of its component species, and includes undisturbed or lightly disturbed habitat along with linkages and corridors that promote species movement."*

The General Plan clearly states (per above) that an "SEA designation is given to land that contains irreplaceable biological resources,... and contain its most important biological resources". Furthermore, it is stated that an SEA designation is given to land that "includes undisturbed or lightly disturbed habitat." However, the proposed SEA map for the Santa Monica Mountains area clearly includes <u>fully developed and disturbed</u> properties, including well-established commercial properties. For example, a five acre site located at 27349 Agoura Road is included as part of the proposed SEA, yet the property is fully developed with an 81,000 square-foot office building and parking

100 Civic Center Way
Calabasas, CA 91302
(818) 224-1600
Fax (818) 225-7324

lot, and has been so developed for more than 12 years. Two other similarly developed office buildings sit within the same corridor in close proximity; all together the three buildings total more than 130,000 s.f. on roughly eight acres of completely developed and disturbed land. No natural habitat whatsoever (nor attendant biological resources) exists on these commercial properties. More importantly, the properties fail to satisfy any of the six criteria listed within the General Plan for SEA determination:

A. The properties and/or corridor offer no natural or undisturbed habitat for core populations of endangered or threatened plant or animal species because it is a fully developed suburban office corridor with streets, streetlights, parking lots, and office buildings. The landscaping for the properties is entirely manicured and unnatural, characterized by automated irrigation systems, landscape lighting, non-native plant materials, and hardscapes.

B. The properties and/or corridor offer no biotic resources that are uncommon on a regional basis because it is a fully developed suburban office corridor with streets, streetlights, parking lots, and office buildings. The landscaping for the properties is entirely manicured and unnatural, characterized by automated irrigation systems, landscape lighting, non-native plant materials, and hardscapes.

C. The properties and/or corridor offer no biotic resources that are uncommon within the political boundaries of Los Angeles County, regardless of their availability elsewhere.

D. The properties and/or corridor offer no habitat that at some point in the life cycle of a species or group of species, serves as concentrated breeding, feeding, resting, migrating grounds; nor do the properties/corridor possess resources that are essential to the maintenance of specific wildlife species. As previously noted, the area is a fully developed suburban office corridor with streets, streetlights, parking lots, and office buildings. The landscaping for the properties is entirely manicured and unnatural, characterized by automated irrigation systems, landscape lighting, non-native plant materials, and hardscapes. It is generally well known that wildlife movement occurs in the general area due to proximity of large open space lands and other protected lands to both the north and south, and the proximate 101 Freeway grade separation which accommodates wildlife movement between these open space areas. But the developed commercial sites, which happen to be located in close proximity to the freeway under-crossing, do not themselves contribute to, support, or enhance the wildlife migration phenomenon; and they clearly do not offer essential resources for wildlife movement, and therefore fail to meet this criterion.

E. The property and/or corridor offers no biotic resources that are of scientific interest because they are either an extreme in physical/geographical limitations, or represent unusual variation in a biotic population or community. As previously noted, the area is a fully developed suburban office corridor with streets, streetlights, parking lots, and office buildings. The landscaping for the properties

is entirely manicured and unnatural, characterized by automated irrigation systems, landscape lighting, non-native plant materials, and hardscapes. In short, no unusual variations in plant or animal life warranting scientific study exist on these properties.

F. Finally, and for the same reasons noted previously, the property and/or corridor offers no biotic resources that would provide for the preservation of relatively undisturbed examples of the original natural biotic communities in the County.

Significantly developed properties clearly should not be mapped as being part of the Santa Monica Mountains SEA, and should not be subject to SEA policies and regulations when they fail to meet any one of the six specified SEA selection criteria. The County planning department seemed to understand this when they excluded many other developed and partially developed areas from the SEA delineations. For example, within the portion of the General Plan which fully describes each of the SEAs, the narrative description of the Santa Monica Mountains SEA includes the following statement: "Within the SEA boundary, there are a number of areas that are not a part of the SEA due to dense development." Accordingly, the narrative points out by way of example that La Sierra, Malibu Lake, and most of the City of Malibu were all excluded. The following language is also contained within this section: "A small island of developed area south of State Route-101 and along Liberty Canyon is excluded from the SEA." This described area of residential development is situated immediately adjacent to the commercial corridor area I discussed earlier. Looking at the SEA map, one might conclude that the residential subdivisions and condominium properties were excluded for density reasons (they total more than 630 units, by the way, with an average density of 2.9 units per acre). But why not also exclude the three existing commercial office buildings located in the same area which collectively total more than 130,000 square feet? The commercial properties are easily more densely developed than the residential subdivisions to the south, and they are certainly not any less urban.

Meanwhile, it is equally troubling to see that only one portion of Malibu Lake was excluded (because, as stated in the narrative, it was "densely developed"); while the other portion of Malibu Lake, which is just as intensely developed, was not excluded. Also, residential developments on ridgelines north of Malibu were excluded, and a portion of the Cornell/Kanan corridor was excluded, while other equally densely developed portions were not excluded. Finally, both Westlake Village and Agoura Hills were almost entirely excluded, with no stream corridors located in either of those communities having been included. For example, Media Creek in Agoura Hills was excluded entirely, while Las Virgenes Creek in Calabasas was included in its entirety in spite of its highly channelized condition that is not altogether different than the condition of Media Creek and other streams in the area. These incongruences are genuinely baffling, suggesting an arbitrary mapping process was employed. All of these observations bring to question whether any rational bases were applied to make these SEA delineations on the proposed SEA maps.

A supplemental SEA map, prepared by the County planning staff, portrays developed properties through the use of red-colored shading. However, it is unclear what purpose the supplemental map actually serves. Fully developed properties do not offer meaningful habitat value and, accordingly, do not contribute to any SEA to the same extent as undeveloped properties. Meanwhile, there appears to be no variation in applicable SEA rules and regulations based upon this supplemental map; thus, it seems that the mapped developed properties are being arbitrarily included in the County's new SEA delineations and made to abide by certain SEA-specific policies and regulations in spite of an obvious lack of a rational nexus. Where such developed properties are clustered together to form a highly modified and inhabited area (characterized by paved roadways, parking lots, buildings, nighttime lighting, and attendant human activity), it would be much more appropriate to simply exclude these areas from the SEA delineations altogether. Meanwhile, isolated and scattered homes and other structures could continue to be depicted on the supplemental map to help guide decision-makers and staff in the consideration of future projects based upon application of a reasonable set of modified SEA standards and guidelines, as would be appropriate for existing development.

Suggestions and Recommendations

First, we strongly recommend that the delineated SEA areas be tightened up to include only those developed or partially developed properties which truly contribute to habitat resources and serve to enhance and strengthen the SEA, consistent with the purpose, intent, and definition of an SEA. Moreover, properties which clearly fail to meet any of the six selection criteria should be unilaterally excluded from any delineated SEA. Accordingly, the existing fully developed commercial properties on West Agoura Road should be excluded from the Santa Monica Mountains SEA. Secondly, overall mapping consistency should be improved such that significantly altered stream channels within urban areas should be consistently included or excluded, rather than arbitrary selection of some urban streams over others without well-reasoned and documented bases for the distinctions.

Thank you again for the opportunity to comment on the draft General Plan Update for Los Angeles County. Please contact Tom Bartlett at 818-224-1703 with any questions you may have.

Sincerely,

Maureen Tamuri, AICP, AIA
Community Development Director

Cc: Tom Bartlett, AICP, City Planner