



Conservation Biology Institute
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Sent via e-mail and post

April 1, 2013

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

RE: comments on December 2012 SEA Ordinance Draft

Dear Ms. Howard:

The Conservation Biology Institute is a 501c3 organization that provides scientific expertise to support conservation and recovery of biological diversity in its natural state through applied research, education, planning, and community service. We have been intimately engaged in numerous conservation planning programs throughout the state.

We commend the development of the SEA Ordinance and its updates. We believe that the ordinance could be strengthened if the ordinance, and specifically the requirements for the analysis of Findings, considers the overall landscape within which an SEA lies and the regional implications of development not only within the SEA itself but also within the landscape of the SEA. We offer the following specific examples, noting that these comments pertain to the ordinance broadly rather than any specific location or project.

1. Page 1. The SEA definition should read “OR to the conservation of biological diversity in the County.”
2. Page 3. Item C should be re-written as: “Avoid impacts to biological resources or ecosystem processes that would compromise the long-term viability of the County’s biological diversity, including direct and indirect impacts to

- connectivity, impacts to landscape integrity, impacts to species populations of significance or their pollinators and dispersers, impacts to the watershed and hydrological processes, and changes in the natural fire regime. These impacts apply to projects outside the SEA, as well as inside the SEA, as they may have indirect impacts on the SEA itself, such as runoff, altered hydrology, and an altered fire regime as the result of creating a new Wildland-Urban Interface (WUI).”
3. Page 5. Applicability should include "transmission lines" as an example of a land use requiring a permit through an SEA.
 4. Page 10-11. Item “J” says that impacts to species should not exceed 50% of the population in the SEA. The 50% limit is not relevant. Rather, the analysis should consider the regional importance of that species population. For example, is this the largest population? Central to genetic connectivity? A genetically distinct population? The only population?
 5. Page 11. Consideration of water resources appears to apply only within the SEA. Rather, the analysis should consider projects adjacent to or upstream of an SEA, thus addressing indirect impacts to the SEA from projects outside the SEA.
 6. Page 18. Item “d” should include "solar panels" as an example of a land use that would alter the land.
 7. Page 20. Development within an SEA should be placed adjacent to the closest infrastructure, minimizing fragmentation of the remaining open space, where possible. This section should also address the desired configuration of the open space, i.e., adjacent to existing open space, where possible.
 8. Page 23. Open Space Ownership and Management Requirements. The open space should be managed by a qualified land manager or land trust, not a Home Owners Association or the City or the applicant.
 9. Page 27. “Loss of viability” is defined to occur when the SEA is literally ruined (bisected, corridor closed, species extirpated). Rather, any fragmentation of an SEA or its surrounding landscape should be considered adversely significant impacts to long-term viability of the area. Similarly, cumulative habitat loss that results in significant impairment of connectivity or compromises a species location or population should be considered adversely significant impacts to long-term viability of the area. Specific examples such as these would be more helpful than (for example) the phrase used in item 3c: "Removal of habitat characteristic of the SEA and described in the SEA’s description provided in the General Plan.”

Ms. Emma Howard
Page 3

Thank you for the opportunity to comment. Please call me for any clarification.

Sincerely,

A handwritten signature in blue ink that reads "Wayne D. Spencer". The signature is fluid and cursive, with the first and last names being more prominent.

Wayne D. Spencer, Ph.D.
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