COOK HILL PROPERTIES

Norman E. Witt, Jr. AICP
Senior Vice President

April 1, 2013

Ms. Emma Howard
Regional Planner, Community Studies North
LA County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Via Email: ehoward@planning.lacounty.gov

Re: Comment to Draft Significant Ecological Areas Ordinance dated December 20, 2012

Dear Ms. Howard:

Cook Hill Properties, LLC (CHP) wishes to submit comments on the 3rd draft of the Significant Ecological Area (SEA) ordinance that was released on December 31, 2012 ("Draft Ordinance').

CHP represents various landowners in Los Angeles County, and to our knowledge, none of those owners were notified that their properties may be affected by the SEA expansion and the Draft Ordinance. The Ordinance, if adopted, will obviously affect future land development, as well as agriculture other businesses, agricultural and other individual land owners.

The Draft Ordinance creates a fundamental shift in land development policy in Los Angeles County. Under current practices, proposed projects are designed, and then analyzed to achieve a balance under CEQA and the existing ordinance by identifying and mitigating environmental impacts. Even the Conservation and Natural Resources Element of the County's draft General Plan (2012) acknowledges that "[t]he General Plan goals and policies are intended to ensure that privately-held lands within the SEAs retain the right of reasonable use, while avoiding activities and developments that are incompatible with the long-term survival of the SEAs." Without a thorough environmental review based on all available science, we do not believe it is appropriate to amend the SEA at this time.

The SEA ordinance and SEATAC as an advisory body should not unnecessarily complicate and duplicate regulatory processes of other state and federal agencies such as California Department of Fish and Wildlife, the US Army Corps of Engineers, US Fish and Wildlife Service or the Regional Water Quality Control Boards. The proposed Draft Ordinance dramatically expands the scope of issues and topics addressed by the current SEA Program, without regard to other regulatory programs that may exist. As a result, many elements of the proposal are fundamentally duplicative of and more importantly, in some cases conflict with the regulations of other resource agencies. Not only will this will create redundancy, but also complications for

individual projects. Since the inception of the County's SEA Program, state and federal agencies have passed new regulations to protect threatened and endangered species; these rules have widely expanded the amount of land designated as critical habitat. The County proposal goes far beyond this already wide scope and further constrains future development. It also uses other land development constraints, such as floodplains, fire zones, or hillsides as the basis for SEA expansion, adding excessive and unreasonable regulation to lands where development is already heavily constrained.

Finally, in order for the public to adequately comment on the Draft Ordinance, Staff should provide "SEA Developed and Disturbed Areas Map" and the "SEA Habitat Linkages and Wildlife Corridors Map". When these Maps are available, CHP and the public will be able to more adequately comment on the Draft Ordinance.

The County must provide for future housing and economic development. We ask for additional study and request flexibility in the proposed plans and ordinances to allow for such development. Hearings or adoption of the Draft Ordinance is premature at this time. Once the public has had an opportunity to review the maps referenced above in conjunction with the Draft Ordinance, we request a public workshop to present testimony and engage in further dialogue with Staff.

Thank you for the opportunity to comment on the Draft Ordinance.

Sincerely,

Norman E. Witt, Jr.
Senior Vice President