

February 2, 2012

Margaret Rhyne
Friends of Antelope Valley Open Space
avopenspace.org
41342 Sequoia Avenue
Palmdale CA 93551
margaretrhyne@yahoo.com

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

Dear Ms. Howard,

We are writing to comment on the newly proposed Significant Ecological Areas Ordinances. We would like to support the concerns expressed by Susan Zahnter of Lake Hughes in a letter to you dated February 1.

In addition, we would urge that all changes to SEATAC regulations maintain and/or strengthen oversight of important biological areas of the Western Antelope Valley. These areas include the Antelope Valley California Poppy Reserve, Ripley Desert Woodland, the Desert Pines Sanctuary, remaining remnants of Joshua Tree Woodlands and protected lands held by conservancies north of the Poppy Reserve (the Desert Mountain Conservancy, the Archeological Conservancy and the Santa Monica Mountains Conservancy).

Of great concern is potential effects of new development in this area due to edge effects, as the negative impacts of inappropriate development is particularly damaging to existing biodiversity within the Fairmont Butte SEA (SEA 57) and nearby Joshua Tree Woodlands (at least eight separate parcels designated as SEA 60) due to extreme habitat fragmentation.

Of particular concern is a change we view on page 2 of the proposed draft in this paragraph:

*"The County Department of Regional Planning (DRP) requires special biological review for **proposed development on any parcel that has a Significant Ecological Area (SEA) overlay,**"*

The color coding here seems to indicate that the text shown in purple will be removed - does this then mean that SEATAC will no longer be required to do a biological review for SEAs but only for (as the paragraph indicates) *"Sensitive Environmental Resource Area (SERA, Coastal Zone), or an Environmentally Sensitive Habitat Area (ESHA, Coastal Zone)"* ?

This appears to be a substantive change. Currently, development within any parcel that has any overlap of the SEA would be reviewed by SEATAC, regardless of whether no development is proposed in the SEA overlay section of the parcel. Under the new ordinance, SEATAC will not review development if it is all outside the SEA overlay.

We fear that this proposed change will degrade the current level of oversight of important biological areas of the Western Antelope Valley. We urge you to retain the current language.

A draft proposal that has the potential to lessen the effect of this proposed change is the creation of SEA 21. This SEA will help to protect biological resources on Portal Ridge and connect this important area to the Antelope Valley California Poppy Reserve. This is a vital step in maintaining existing biological connections between the Reserve, Portal Ridge and the Angeles Forest, a step crucial in preventing the Poppy Reserve from becoming a biological island. We strongly support the creation of this new SEA 21.

We believe however that this new SEA does not lessen the need to retain the current level of SEATAC review for areas with significant SEA overlay. This is particularly important as existing fragmentation of Joshua Tree/ Juniper Woodland SEAs (currently SEA 60, proposed as SEA 11) will still exist under the new plan. In addition, we are concerned that the Poppy Reserve and Fairmont Butte, may still be exposed to edge effects as they will form a small "peninsula" of SEA 21 jutting into areas that are not designated as SEAs and therefore without any SEATAC oversight if the current language regarding oversight is altered.

In conclusion, we would like to complement Los Angeles County on the services provided by SEATAC and the very valuable contributions the committee makes to the protection of the biological treasures of the county particularly in the sometimes overlooked Western Antelope Valley. We look forward to the continuation of this program with its current level of oversight and support the proposed extension of that oversight made possible by the creation of SEA 21. Thank you for considering our comments regarding the preservation of this unique part of Los Angeles County.

Margaret Rhyne
Friends of Antelope Valley Open Space (FAVOS)