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September 25, 2014

SEA Program
c/o Ms. Emma Howard
Regional Planning Dept., Floor 13
320 W. Temple Street
Los Angeles, CA 90012

Re: Comments on SEA Ordinance Revision – Draft 5 dated March 24, 2014

Thank you for the opportunity to provide comment on the Los Angeles County SEA ordinance revision dated March 24, 2014. I am a resident of Acton and reside in the Angeles Forest Highway area. I own 40 acres located in the Vincent grade. I moved to Acton in 1999 for the rural lifestyle and to be able to own horses, sheep, and to train my dogs in sheep herding on the field located on my property. My sheep graze down the weeds that help in weed abatement but are mostly fed alfalfa from the feed store. We haven't had the grazing areas since the rain hasn't brought the grass. We were highly commended for keeping the land free from weeds during the 2004 fire by the fire department because it was instrumental in allowing them to stop the blaze of the fire from moving on down into the neighborhoods since we border the national forest. I protect our land, our junipers, our sage, and understand the efforts of LA County to establish Significant Ecologic Areas. I have comments and questions on several elements of the plan that disturb us. They are as follows:

22.52.2905 Definitions

A. "Agricultural Developed Area" means areas that have been developed for agricultural purposes as depicted on the SEA development Map. "

My comment is that our property and most of the area is currently zoned A-1 and will be soon changing to A-2 – Heavy Agricultural Zone with the AV General Plan Revision. Some of the many permitted uses in the A-2 zone (See Title 22 – Planning and Zoning, Division 1, Chapter 22.24 – Agricultural Zones – Part 3 A-2 Heavy Agricultural Zones) are community gardens, Crops-Field, tree, Bush, Berry, and row, including nursery stock, raising of horses and other equine, cattle, sheep, goats, alpacas, dog kennels, dog training, etc. - as well as single family residences. The list goes on and on. If my property is not listed on the “Agricultural Developed area, does this mean I CANNOT use my property for the use which it is legally ZONED? Once the SEA Ordinance is adopted, if our property is not in the Agricultural Developed Area, and we want to use it for the uses listed in the A-2 zoning definition, does that mean we may not? This is instrumental to my living here as I train the dogs and horses here, and make my living training dogs for ranchers, etc. This is why I purchased this property. Many of the other residents are also using their property for horse and livestock keeping, and training.

D. “Developed Area” means areas that have been developed, except those that have been developed for agricultural purposes as depicted on the SEA Development MAP. It is critical that the SEA Development MAP properly reflects Acton’s CURRENTLY developed areas which would include residential dwellings, horse arenas, dog training areas, and accessory buildings. Since development, (including equestrian and dog training facilities) in the draft SEA are less restrictive in these “developed areas “, they must be properly plotted as they exist BEFORE the SEA Ordinance is adopted.

H. “Natural Open Space” means any open space that will remain in an undisturbed natural state”. If part of one’s property lies within a “Natural Open Space”, does that mean that there will be no walking on the property, or riding a horse on the property?

K. “SEA Development Map” – means the map maintained by the Department that depicts all Developed Areas and Agricultural Developed Areas within SEAS approved for development pursuant to this Part 28, including areas developed prior to the effective date of this ordinance.” AGAIN, it is critical that the SEA Development MAP properly reflects Acton’s CURRENTLY developed areas which would include residential dwellings, horse arenas, sheep training areas, and accessory buildings. Since development (including equestrian and dog training facilities) in the draft SEA are less restrictive in these “developed areas “, they should be properly plotted as they exist BEFORE the SEA Ordinance is adopted.

22.52.2915 Permitted Uses. “Property may be used for the following, provided that an observed or likely to occur species of special status officially listed by the State or Federal Governments as Endangered, Threatened or Rare is not discovered; and a ministerial Site Plan Review application is approved pursuant to Section 22.52.2950 except as modified herein:

The phrase “observed or likely to occur” species is far too vague and leaves way too much room for interpretation and a “what if” scenario. If a species is has never been in an area, but may likely occur in an area because of the habitat type, then permitted uses will not be allowed. This coupled with inconsistent interpretation of the Ordinance by staff biologists will lead to much confusion. The

phrase "observed or likely to occur" needs to be made more specific and more realistic to what actually exists on the land now.

Also and very importantly, "Permitted Uses" needs to include keeping of equestrians, and other livestock and poultry, as is described in the County zoning code 22.24.070 – Zone A-1 – Light Agriculture, and 22.24.120 - Zone A-2 Heavy Agriculture. Acton is a rural community, and most of the residents already keep horses and other forms of livestock.

22.52.2925 Development Standards

H. Habitat Preservation Areas

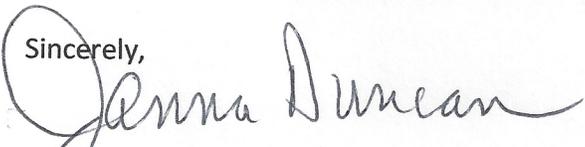
3. "Prior to approval of the Site Plan Review, a covenant and agreement shall be recorded in the office of the County Registrar-Recorder/County Clerk, agreeing to set aside the Habitat Preservation Areas as Natural Open Space in perpetuity." Habitat Preservation Areas shall also be depicted on the SEA Development MAP. "

In essence, if a citizen's land lies within a Habitat Preservation area and he or she wants to develop the land, the County is asking residents to "give up" their land - up to three quarters of the land if in a High Habitat Value area, to not use it, and to continue to pay taxes on it. Something is wrong here. If the County wants to protect the land that a citizen owns, they should provide some form of financial help to that citizen for the protection of the land. I.e. Such as lowering the property taxes in these areas, since the citizen will not be able to use the land and this restriction will greatly reduce the property value. Also, when such land is set aside, will the citizen still be able to walk on it and /or to ride a horse over it?

I would hope that my comments will help Regional Planning Staff understand how their proposed ordinance will affect the community and adjust the ordinance accordingly so that there is not a "taking of land" and that the citizens can use the land as it is zoned and for the purposes under which the land was purchased.

Thank you for your consideration of these important and pertinent comments.

Sincerely,


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