



LOS ANGELES AREA
CHAMBER OF COMMERCE
125th anniversary

April 1, 2013

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

RE: Significant Ecological Area Ordinance – December 2012 Draft

Dear Ms. Howard,

On behalf of the Los Angeles Area Chamber of Commerce and our 1,600 member organizations, I write to provide comments on the December 2012 draft of the County's Significant Ecological Area (SEA) Ordinance. Specifically, we are concerned with the level and breadth of outreach conducted for property owners to encourage input on the draft ordinance. We also seek clarification on the criteria used to create the proposed SEA boundaries. As the L.A. Chamber has members throughout the County who may be impacted by the future development potential of job-creating land established by this ordinance, we believe it is critical to properly draft and gather input from key stakeholders such as the business community and property owners.

Significant changes to SEAs, as outlined in this ordinance, may impact thousands of current and future property owners through down-zoning, decreased land values, and decreased densities. The Chamber recommends a robust and thorough outreach process to property owners to ensure their input is considered before final adoption. We request information on whether and how broadly direct mailings to property owners on the proposed changes have occurred. We believe a direct mailing with personal outreach to explain the impacts of the ordinance in laymen's terms and inclusion of sufficient time and ease of opportunity for input is most effective to reach and inform such a diverse and geographically dispersed group of landowners. The Chamber is happy to partner with the County to help conduct outreach and solicit input from property owners and other business community stakeholders on this important issue.

We also hope the next draft of the SEA Ordinance provides a clear methodology and reasoning to explain the dramatic increase in the impacted acreage and biological diversity. As you know, the current draft of the Ordinance expands SEAs by 520,000 acres (from 125,787 acres to 645,517 acres), an increase of nearly 200 percent, without adequate explanation to stakeholders or an assessment of the potential economic impact to the County as a result. Based on available information, it appears that several other constraints in development such as flood zones, hillsides, seismic zones, liquefaction, etc. were utilized to expand the boundaries and acreage – an observation of which we would like confirmation.

The next draft of the Ordinance should also include the biological changes undergone in impacted areas to warrant the expansion of the SEA boundaries. We request detailed information on the

studies conducted for each newly-designed parcel and explanations of which aspects of those studies were used to justify their inclusion in a SEA.

While we appreciate and respect the amount of time and effort the County has invested in completing multiple revisions of this important ordinance, we feel there is much work to be done to ensure a final product that accommodates and encourages economic and job growth and establishes a development process that is timely, consistent, and predictable for critical infrastructure and housing projects. We look forward to working with you to ensure the final SEA Ordinance protects our region's future economic vitality and produces a better quality of life and opportunities for growth for businesses, property owners, and residents.

If you have any questions, please contact Tina Hossain at thossain@lachamber.com or (213) 580-7531. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Gary Toebben". The signature is written in a cursive, flowing style.

Gary Toebben
President & CEO