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Los Angeles, California 90093

DRAFT

July 25, 2014

Emma Howard
Regional Planning Department Floor 13
320 W. Temple Street
Los Angeles, CA 90012
via email: ehoward@planning.lacounty.gov

Re: Los Angeles County Significant Ecological Areas Ordinance Update – Draft 5

Dear Ms. Howard:

Los Angeles Audubon is a California non-profit corporation with 501(c)(3) status, and a chapter of the National Audubon Society. We serve over 5,000 members and supporters in your district in the Los Angeles area. Our mission is to promote the enjoyment and protection of birds through recreation, education, conservation and restoration.

Thank you for the opportunity to comment on the March draft of the Significant Ecological Areas Ordinance.

U.S. Fish & Wildlife Service has identified 5 million birdwatchers and nature viewers in California who leave their homes to enjoy California's natural wonders.¹ The report identifies the economic benefits of trip-related and equipment related expenditures in 2011. While Los Angeles County is not broken out in this study, according to the total trip and equipment expenditures in the U.S. for the year 2011 the total amount is \$ 41 billion. Los Angeles County is a key destination for bird watchers from throughout the world.

In addition to consideration of the ecological and environmental benefits of the SEA ordinance, we suggest that the Commission also consider the economic benefits to the tourism, hospitality, transportation, and other economic sectors of Los Angeles County, as well as housing

¹ Birding in the United States: A Demographic and Economic Analysis, Addendum to the 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, U.S. Fish & Wildlife Service, Report 2011-1. <http://www.fws.gov/southeast/economicImpact/pdf/2011-BirdingReport--FINAL.pdf>

development, in sustaining and building on the current SEA program through the ordinance and the proposed expansion of lands identified in the program.

We think the County of Los Angeles has been wise, progressive and balanced in creating and implementing the SEA program that is not restrictive, allows development, but sets a higher standard of review in areas that play a key role in the ecology of our diverse habitats – ocean, coast, mountains, forests, grasslands, desert, agriculture, hillsides – that make Los Angeles County such a desirable destination for its citizens and others from around the world who come to enjoy scenic, natural open spaces and wildlife.

Specifically, within the draft of the ordinance, our comments are:

Section 2. Section 2208.190 – Definition of SEATAC

The ordinance should define a qualified “expert” as “local, independent, scientist with a graduate degree in ecology or one of the ecological sciences – ornithology, botany, etc – from an accredited school or university, and who does not have a conflict of interest.

Section 22.52.2905 Definitions.

A. “Agricultural Developed Area.” The definition should include a description that agricultural developed areas can provide nesting and foraging habitat for wildlife including fully protected species and sensitive species of birds.

F. “Habitat Preservation Area” should be defined as Natural Open Space Area of equivalent habitat value and in the same impacted area that will be provided to offset SEA Habitat Type Development.

K. “SEA Development Map” Agricultural Developed Areas within SEAS approved for development should be assessed for habitat value for wildlife including nesting and foraging habitat as well as natural areas.

Section 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 Government as Endangered, Threatened, Rare or Sensitive is not discovered.....

Section 22.52.2920 Permitted Uses – Review Procedures

2. add Sensitive as above.

22.522925 Development Standards

2. Water Resources Setback. Setbacks should be determined by the largest Water Resource Size in the historical record, up to 100 years if possible, rather than at the time of inspection by Staff

Biologist. With predictions of increased and more lengthy drought periods in Southern California, development or project site analysis during these periods in order to minimize setbacks should not be incentivized.

22.52.2935 Uses Subject to Permits – Application Procedures.

(2) b. add or Sensitive as above.

22.52.2945 Uses Subject to Permits – Conditions of Approval or issuance.

d. Open Space Ownership and Management. This section should include provision of an endowment for management of the Natural Open Space.

Appendix for Part 28

2. Antelope Valley SEA

The SEA Ordinance should take this opportunity to re-evaluate the Habitat Value of Non-native Grassland. Much of the last remaining grassland in the Antelope Valley may be non-native or a mix of native and non-native. Grasslands should all have high value due to the loss of grassland habitat in the Antelope Valley.

15. Santa Monica Mountains

The SEA Ordinance should take this opportunity to re-evaluate the Habitat Value of Coastal Sage Scrub in the Santa Monica Mountains. World-renowned ecologist E.O. Wilson has named Southern California one of the top 18 biodiversity hot spots in the world, and Myers, et. al. recognized coastal California sage scrub as one of 25 worldwide hotspots in their notable paper Biodiversity hotspots for conservation priorities published in the journal Nature in 2000.

We thank you for the opportunity to provide these comments.

Sincerely,



Garry George
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