



LEONA VALLEY TOWN COUNCIL

P.O. BOX 795 • LEONA VALLEY • CA 93551

July 28, 2012

County of Los Angeles
Department of Regional Planning
320 W. Temple Street
Room 1354
Los Angeles, CA 90012

Dear Ms. Howard

We would like to take this opportunity to comment on the June 2012 SEA Ordinance Summary Draft and SEA Ordinance Change Comparison Chart June 2012 that was recently released as an update to the November 2011 Preliminary Draft Significant Ecological Areas & Hillside Management Conditional Use Permit Ordinance.

Unfortunately, the June 2012 SEA Ordinance Summary Draft and SEA Ordinance Change Comparison Chart June 2012 were both so deficient in information that we are unable to comment in any meaningful way. The wholesale revision of the November Preliminary Draft has gutted the protections previously provided. Virtually every section has disclaimers. These include "details are forthcoming", "definitions" are to follow, the "Development Standards are forthcoming", the anticipated design manual for SEA CUPs is "forthcoming", and that the descriptions for two new SEA CUPs and an ETA will follow. In fact, within the eight core pages of the Draft Summary document, the word "forthcoming" was used nine times, covering nearly every section in the document.

In completing an ordinance, the County has the responsibility to comply with every aspect of the California Environmental Quality Act. What has been produced in your Draft Summary document is an example of piecemealing. Piecemealing results in an inaccurate project description because essential pieces of the projects are not included. Since "forthcoming" is stated nine times within those eight pages, we believe that essential portions of this document are clearly missing. "An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." (Burbank-Glendale-Pasadena Airport Authority, 233 Cal. App. 3d at 592).

"A curtailed, enigmatic or unstable project description draws a red herring across the path of public input" (County of Inyo. 71 Cal. App. 3d 185 at 193; McQueen v Board of Directors (1988) 202 Cal. App. 3d 1136, 1143). Clearly, the path of public input has been curtailed in this instance because there are too many elements from the Draft Summary that are missing or incomplete.

We very much want to be able to review this documentation, and even went to the extent of inserting your June changes into the November 2011 Preliminary Draft, but it didn't help to



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clarify any of the new information. We feel we simply can't comment on the June document changes due to the overwhelming incompleteness and vagueness of what was presented.

However, we would like to state that we are disappointed that the Hillside Management portion has been eliminated from the November 2011 Preliminary Draft and we are also disappointed that your Department has yet to produce an initial preliminary HMA draft release for review. Because our community is very much within a Significant Ecological Area and consists primarily of hillsides we feel it is difficult to evaluate one document without the other. We are also deeply disturbed by the changes in SEATAC involvement in the process. Their influence has been virtually eviscerated. Coupled with the transfer of most aspects of the ordinance into a yet to be developed "design manual" which not only does not have the force of law, but, incredibly, is only a "recommendation" for developers to follow, this new draft completely decimates the November 2011 Preliminary Draft.

At this point we will reserve our right to make our comments on any future, more comprehensible, draft of the SEA Ordinance and Hillside Management Ordinance that you may issue.

As always, we look forward to working with you.

Respectfully,

A handwritten signature in black ink that reads "Bill Elliott".

William Elliott

President

Leona Valley Town Council

Cc: Supervisor Michael D. Antonovich
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Norman Hickling, Deputy to Supervisor Michael D. Antonovich
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