



Poppy Reserve/ Mojave Desert Interpretive Association  
(PR/MDIA)  
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Margaret Rhyne  
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April 1, 2013

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

Re: Draft Significant Ecological Area Ordinance, December 20, 2012

Dear Ms. Howard,

The Poppy Reserve/ Mojave Desert Interpretive Association appreciates the opportunity to again comment on the December draft of the proposed SEA ordinance. We remain concerned about the wide ranging significance of changes to existing SEATAC procedures particularly in light of the rapid industrialization of the Western Antelope Valley caused by renewable energy projects.

The threat of rapid and irreversible destruction of this biologically rich and diverse area is unprecedented. We have raised many issues concerning these threats in previous letters. We remain concerned about these same issues. (Copy of letter of February 4, 2013 is attached).

A step toward resolving some of our concerns is suggested in the letter of March 31, 2013, submitted by Susan Zahnter on behalf of Concerned Citizens of the West Antelope Valley and Friends of Antelope Valley Open Space. In the conclusion of that letter, Ms. Zahnter recommends that all Industrial-scale renewable energy projects require SEATAC review.

As stated in Ms. Zahnter's letter, "industrial-scale energy projects, even though they may not be directly in or adjacent to an SEA, would have far reaching effects on habitats and wildlife therein, via air borne particulate matter, watercourse drainage, roads, structures, equipment, and activities related to daily operations."

We are witnessing many of these far reaching effects as we watch the rapid destruction of lands that once supported native wildflowers and provided food and shelter for threatened species. The extreme ground disturbance that results from the scraping and leveling of desert grasslands for industrial-solar installation has resulted in clouds of dust enveloping our neighborhoods and playgrounds. These dirt clouds coat habitat on adjacent lands, blind drivers on our desert roads and expose residents to health threats from inhaled particulates and the spores of valley fever.

Even when an EIR is required, grassroots organizations like ours do not have the resources to hire our own experts to adequately comment on the assertions made in those documents. It is logical and imperative then that these massive industrial energy developments, consuming land at a rapid pace and with such far reaching, long term and unprecedented cumulative effects, be subjected to the type of careful consideration that will only be afforded by the opportunity for SEATAC to review and comment.

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

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661 609-7280

Attached: Letter of February 4, 2013



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February 4, 2013

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

**SEA Ordinance Draft**

Dear Ms. Howard:

We again urge that all changes to SEA regulations maintain and/or strengthen oversight of biologically important areas within SEAs, particularly the very scarce areas of preserved habitat already protected by public and private entities in the Western Antelope Valley. Due to the small size of these protected lands, it remains crucial that the Significant Ecological Areas Technical Advisory Committee has the ability to comment on development proposed for the borders of these areas. These protected areas include the Antelope Valley California Poppy Reserve and Ripley Desert Woodland State Parks; the L.A. County Desert Pines Sanctuary; and protected lands held by conservancies north of the Poppy Reserve (the Desert Mountain Conservancy, the Archeological Conservancy and the Santa Monica Mountains Conservancy). These are the only existing areas that from contiguous blocks of protected habitat outside the Angeles Forest within existing or proposed SEAs in the Western Antelope Valley. Due to edge effects, the biological resources of these areas are critically vulnerable to degradation from proposed adjacent development.

The accompanying maps show the relationship between the two state parks that represent important protected areas in the Western Antelope Valley and the proposed San Andreas and Joshua Trees SEAs. Both of these parks are included within the proposed SEAs but the borders of the SEAs do not extend significantly (or in some cases at all) beyond the existing borders of these parks. Even with the approval of the proposed extension of SEAs in the Antelope Valley, these state parks will remain vulnerable along most of their borders. Therefore, SEATAC review and assessment of the impacts of development adjacent to these important biological preserves remains imperative.

As further evidence of the biological importance of lands adjacent to one of these parks, the Antelope Valley California Poppy Reserve, is the map shown on page 4 which indicates in orange the boundaries of land recommended for protection due to the reliability in that area of the springtime bloom of the state flower, the California Poppy. This recommendation was made after a statewide survey conducted in the 1970s, which searched for land within the state most suitable for a place to protect the state flower. The area identified by that survey was in the Western Antelope Valley and is shown by the orange border on the page 4 map.

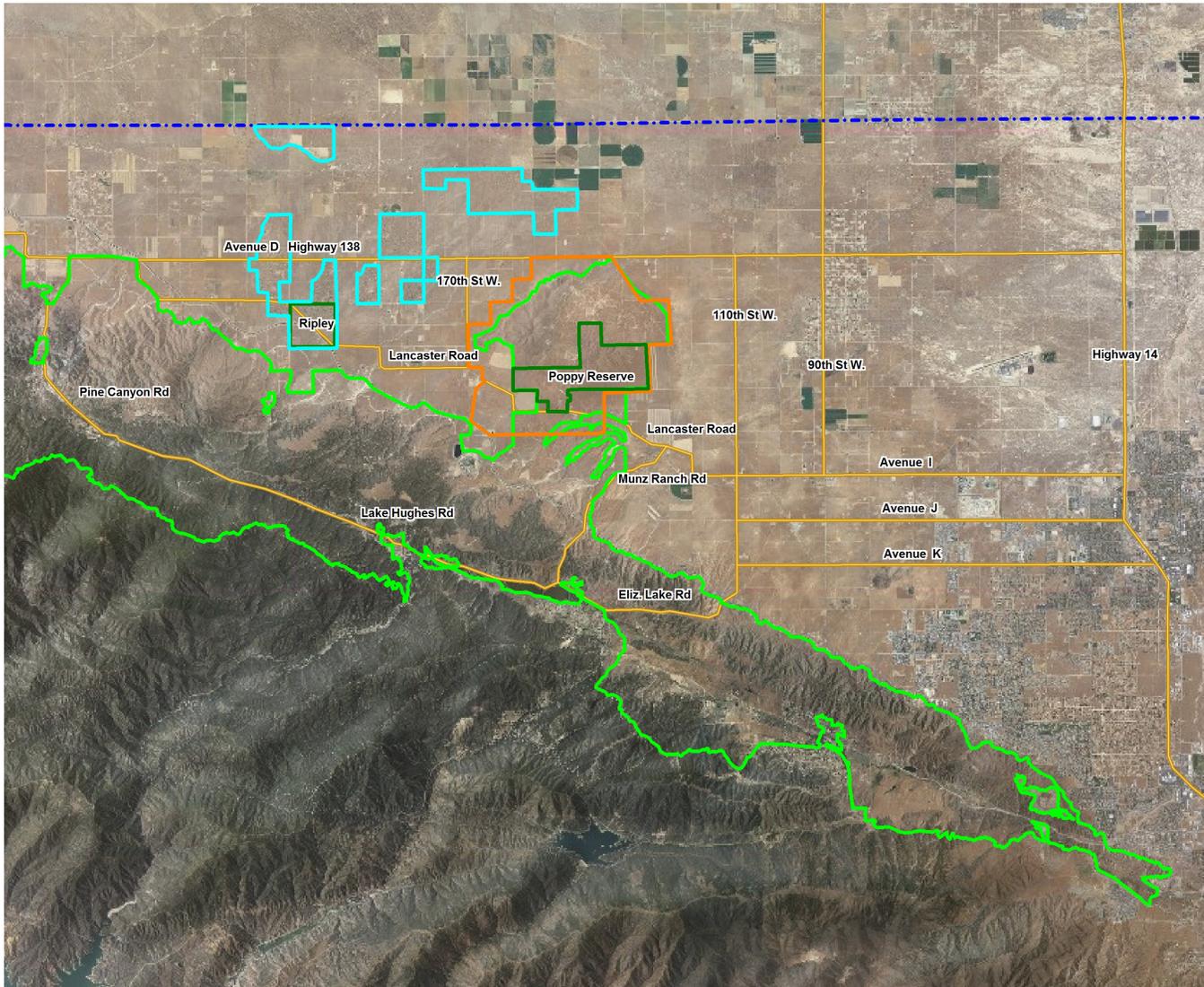
Fortunately, a portion of this survey area was indeed preserved when citizens of the Antelope Valley combined their efforts with groups across the state to create the Antelope Valley California Poppy Reserve, founded in 1976. Unfortunately this park represents less than half of the land originally recommended for preservation as the accompanying maps illustrate.

The map on page 5 shows the vulnerability of Ripley Desert Woodland State Park to edge effects. Most of its existing border is contiguous with a portion of the fragmented proposed Joshua Tree SEA. This woodland represents the only area on the valley floor where the increasing rare Joshua Tree - California Juniper Woodland is protected. It is vital that SEATAC have the ability to comment on development proposed for land adjacent to this very valuable biologically diverse area.

Our non-profit, the Poppy Reserve/ Mojave Desert Interpretive Association, was founded 30 years ago by area citizens dedicated to promoting and preserving important natural habitats of the Antelope Valley. Those protected areas now include the Antelope Valley California Poppy Reserve and Arthur B. Ripley Desert Woodland as well as three other Mojave Desert California State Parks. We rely on the scientific expertise of the Significant Ecological Areas Technical Advisory Committee to help us preserve these treasures for future generations. Without the ability of the Committee to comment on proposed adjacent development, that preservation will be jeopardized. Thank you for considering our comments.



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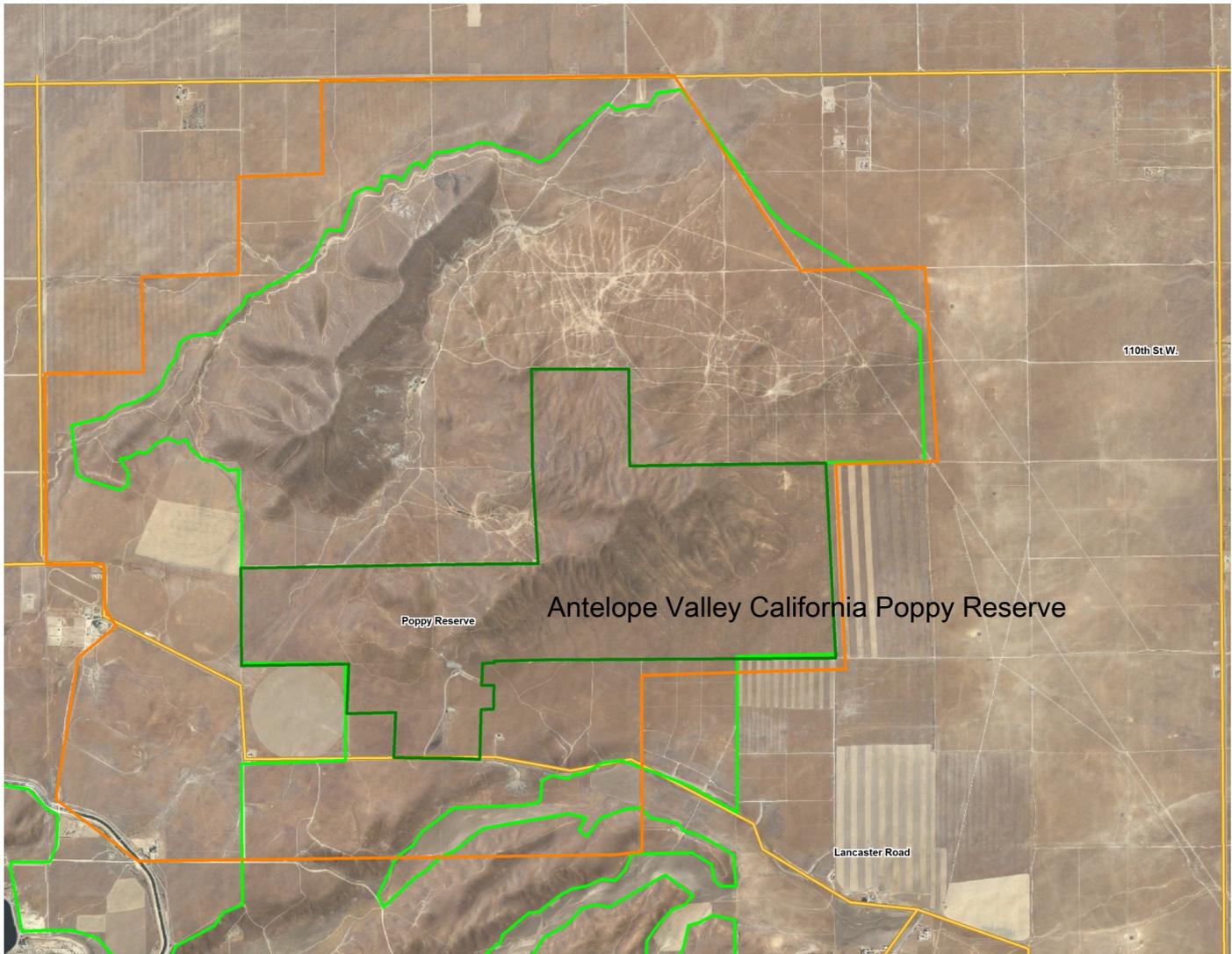


Light Green: Proposed San Andreas SEA

Blue: Proposed Joshua Tree SEA

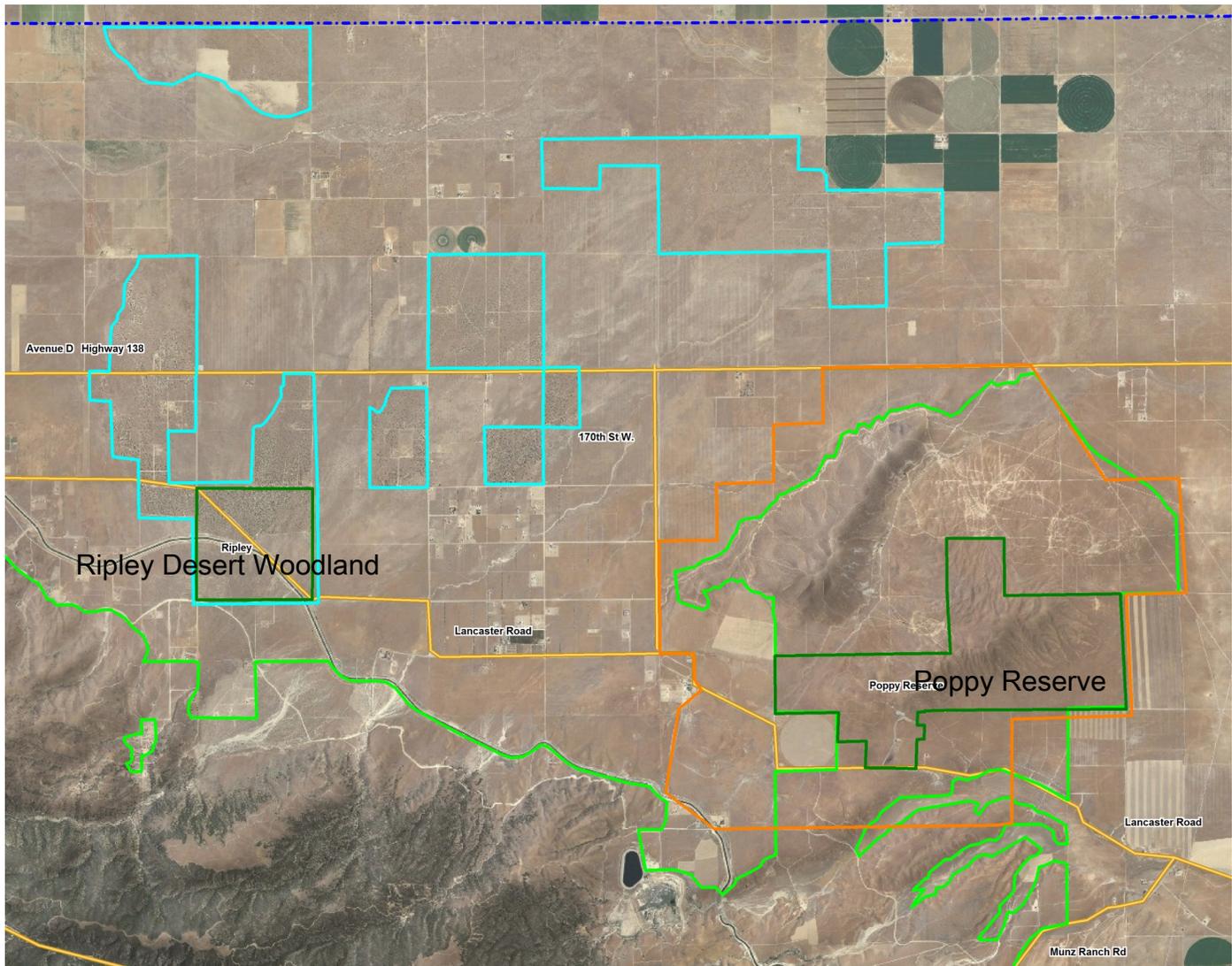
Orange: Survey conducted in the 1970s identified this area as valuable habitat for the California Poppy and recommended that this the area be preserved as the only place in the state specifically set aside to protect the state flower

Dark Green: Antelope Valley California Poppy Reserve and Ripley Desert Woodland .



Light Green: Proposed San Andreas SEA

Orange: Survey conducted in the 1970s identified this area as valuable habitat for the California Poppy and recommended that the area be preserved as the only place in the state specifically set aside to protect the state flower



Light Green: Proposed San Andreas SEA

Blue: Proposed Joshua Tree SEA

Dark Green: Antelope Valley California Poppy Reserve and Ripley Desert Woodland  
Ripley Desert Woodland State Park and the adjacent Desert Pines Woodland (south of Ripley) are among the few places in the Antelope Valley outside the National Forest where native habitats are protected.