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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

**June 2010 SEA Ordinance Summary Draft
SEA Ordinance Change Comparison Chart 2012**

Dear Ms. Howard,

We are greatly concerned that proposed changes to SEA Ordinances will undermine the mission of our organization to ensure the preservation for future generations of the biological treasures of the Western Antelope Valley. 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 urge that all changes to SEA regulations maintain and/or strengthen oversight of biologically important areas within SEAs, particularly areas of preserved habitat already protected by public and private entities in the Western Antelope Valley. These areas include the Poppy Reserve and Ripley Desert Woodland; 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 form contiguous blocks of protected habitat in SEA 57 or the proposed SEA 21. Due to edge effects, the biological resources of these areas are critically vulnerable to degradation from proposed adjacent development.

Language included in the draft documents released in June concerning proposed revisions of SEA Ordinances heightens our concerns for the future protection of these areas as these changes seem to indicate a lessening rather than strengthening of

oversight. Specifically, we object to the change indicated on page 5 of the "Draft Significant Ecological Areas Ordinance Summary Draft June 2012." This change lists the following as "exempted" from permit standards and therefore from SEATAC review:

"1. Any ground disturbance/ development activity where the entire footprint of the ground disturbance/ development activity, including associated infrastructure, grading and fuel modification areas, is located outside of the Significant Ecological Area or Ecological Transition Area. "

This change would prevent SEATAC assessment of potential impacts by proposed development adjacent to protected habitat areas such as the Antelope Valley California Poppy Reserve and Ripley Desert Woodland. Both of these parks are included in existing SEAs but the borders of these SEAs do not extend significantly beyond the existing borders of these state 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 citizens of Los Angeles County who love the remaining wild places in the Antelope Valley, known worldwide for springtime carpets of increasingly rare native wildflowers, 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.

Also of concern are changes indicated in the "SEA Ordinance Change Comparison Chart" of June 12. Items 2 - 6 on pages 12-13 indicate that many crucial existing SEATAC requirements for a "Complete Conditional Use Permit" will be deleted. These deletions include: a "complete record of recommendations made by the Significant Ecological Area Technical Advisory Committee during its review of the Initial Project Appraisal; a final project appraisal document; a biological constraints analysis; a biota report; and written analysis detailing compliance with development standards." This appears to be a significant change that would impact the ability of SEATAC to comment on proposed development potentially damaging to the biological resources of SEAs. If we are interpreting this chart correctly, this is alarming. We urge further clarification concerning these provisions evidently proposed for deletion.

A proposed change to the overall SEA program that we support is the creation of SEA 21. This SEA will help to protect biological resources on Portal Ridge and connect this important biologically rich and diverse area to the Antelope Valley California Poppy Reserve. This is a vital step in maintaining connectivity between the Reserve, Portal Ridge and the Angeles Forest, a step crucial in preventing the Poppy Reserve from becoming a biological island. We strongly support the creation of this new SEA.

Unfortunately, the creation of this new SEA will not lessen the need to protect the ability of SEATAC to review development adjacent to existing preserved habitats. This is particularly important as fragmentation of Joshua Tree/ Juniper Woodland SEAs (currently SEA 60, proposed as SEA 11) which includes Ripley Desert Woodland, will still exist under the new plan. In addition, we are concerned that the Poppy Reserve and conservancy land on Fairmont Butte will still be exposed to edge effects as they would form a small "peninsula" of SEA 21 jutting into areas that are not designated as SEAs or ETAs and therefore without any SEATAC oversight if proposed ordinance revisions are adopted.

In conclusion, we would like to again state that it is crucial that SEATAC be able to comment on development adjacent to the Poppy Reserve, Ripley Desert Woodland, and land north of the Poppy Reserve held by the three different conservancies as these areas compose the largest parcels of contiguous blocks of protected natural habitat within both the existing SEA 57 and proposed SEA 21.

We would like to complement Los Angeles County on the very valuable contributions that Significant Ecological Area Technical Advisory Committee makes to the protection of county biological treasures particularly in the sometimes overlooked Western Antelope Valley. We support the proposed creation of SEAs 11 and 21 and we urge the county to continue the SEATAC program guided by an ordinance which will strengthen oversight of existing protected natural habitats within SEAs. Thank you for considering our comments.

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