

# SCOPE

## Santa Clarita Organization for Planning and the Environment

TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY  
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



8-6-14

Commissioners, Los Angeles County Regional Planning Commission  
and Emma Howard, Staff, Regional Planning Department  
Room 1354  
320 W. Temple Street  
Los Angeles, CA 90012  
[ehoward@planning.lacounty.gov](mailto:ehoward@planning.lacounty.gov)

RE: Comments on the Draft SEA Connectivity and Constriction Map – April 2014 and  
Significant Ecological Areas Ordinance Update – Draft 5

### *Delivered by hand to the Commission and via email*

Honorable Commissioners and Ms. Howard:

We generally support the SEA Ordinance update and Boundary maps, but have a few additional comments and suggestions. We concur with and incorporate by reference letters submitted to you by the Endangered Habitats League of Feb. 3<sup>rd</sup> and Feb. 23<sup>rd</sup> 2014, and by the Center for Biological Diversity on July 23<sup>rd</sup> 2014.

### Comments on SEA Map

It is our understanding that SEA boundaries in the Santa Clarita Valley will not be changed from the boundaries mapped in the 2012 Santa Clarita Valley Area Plan Update. However, we are concerned about the minor boundary adjustments and uses that the SEA ordinance may permit. No changes or change in use should be allowed without a noticed hearing in which all parties of concern are notified. This should include protected tree removals.<sup>1</sup>

We concur with commentors requesting removal of landfills from SEAs. The destruction of landforms and habitat necessitated by landfill development and/or expansions is incompatible with the protection granted for SEAs under the ordinance.

### Additions to SEAs

We support areas nominated by other groups that would add to the SEAs. These nominations appear to be carefully considered and would provide added long-term sustainability of the natural habitat of the Los Angeles region. This also makes sense where the areas nominated are managed by conservancies, or preserved as open space managed by government agencies. However,

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<sup>1</sup> This comment is made in response to oak tree removals allowed in SEA 64 for oaks that were previously conditioned to be preserved.

the SEA designation should enhance and add assurances to the preservation of these areas, not be used as a tool to allow uses that would not otherwise be permitted in such open space or conserved areas. Thus, the SEA designation should not be allowed to permit by CUP a use or other adjustment that would not have been allowed by the tenants and conditions under which the open space was established.

#### Wildlife Connectivity Corridors

We would like to express our concern that corridors limited to 700' may be too narrow to provide adequate coverage for wildlife movement. Thinning or brushing for fire should not be allowed in wildlife corridors as removal of cover can destroy these fragile links.

### Comments on the SEA Ordinance

#### SEA Connectivity Areas.

The ordinance states that "Development within a Connectivity Area shall not be located within portions that are less than 1,000 feet in width; or reduce the width of a Connectivity Area to less than 1,000 feet at any point." Language should be incorporated into the ordinance that ensures development is far enough away to not require any brushing or thinning for fire in the connectivity corridors.

We repeat our concern that corridors limited to 700' or even 1000' may be too narrow to provide adequate cover for wildlife movement. Thinning, brushing or controlled burns for fire should not be allowed in wildlife corridors as removal of cover can destroy these fragile links. No nearby development should allowed that would require such thinning.

#### SEA Constriction Areas.

Ordinance – "Development within a Constriction Area shall not be located within portions that are less than 200 feet in width; or reduce the width of a Constriction Area to less than 200 feet at any point."<sup>2</sup>

We believe that 200' is biologically unsustainable. The footage should be a minimum of 1500'. This section seems to contradict the definition of a connectivity corridor made earlier in the ordinance.

#### Fire Control Thinning

Thinning, brushing and controlled burns for fire may substantially harm wildlife and habitat areas, especially those that are limited in size or are connectivity corridors. Any development considered in or near an SEA should include the fire buffer as part of the development foot print and be set far enough away so as not to affect any sensitive habitat area. It appears the ordinance intends to do this, but more clarity of language may be needed.

Wildfires will continue to be an ever increasing problem in urban boundary areas. Development in these areas should be discouraged both to protect the habitat areas and to protect homeowners from wildfires.

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<sup>2</sup> Pg 17, Development Standards, Section G

Applicable Laws

We concur with the Center for Biological Diversity where they state in their July 23<sup>rd</sup> letter that the ordinance should list additional applicable laws and also include future state or Federal protection legislation. It would be unfair to applicants to give the impression that those laws not listed in the Ordinance are of no consequence in the consideration of development in SEA areas.

Notification of minor changes.

While we understand the County's efforts to streamline the SEA process, we believe that it is imperative to develop a "concerned parties' notification list" and provide notification for even minor changes, tree removals or uses within an SEA. It is unfair to the public to hold extensive development hearings, ensure preservation of an area with certain conditions and then come back a few years later and change these conditions with no notice to those involved members of the public who helped craft the original mitigation.

Conclusion

We thank the County and its staff for their diligent efforts to make the SEA process more efficient while at the same time protecting the resource.

Sincerely,



Lynne Plambeck  
President