



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE  
Chief Engineer and General Manager

February 3, 2014

Ms. Emma Howard  
County of Los Angeles  
Regional Planning Department  
Room 1354  
320 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Howard:

## **Comments on Draft Significant Ecological Area (SEA) Boundaries and December 5, 2014, Draft SEA Ordinance Update**

The Sanitation Districts of Los Angeles County (Districts) appreciate this opportunity to review and submit comments on the Draft SEA boundaries (provided on July 18, 2013, by the Los Angeles County Department of Regional Planning (Regional Planning) at <http://egis3.lacounty.gov/dataportal/2011/12/12/significant-ecological-areas-sea-proposed/>) and the December 5, 2014, Draft SEA Ordinance. The Districts are a confederation of 23 special districts that operate and maintain regional wastewater and solid waste management systems for approximately 5 million people residing in 78 cities and unincorporated portions of Los Angeles County.

The Districts support Regional Planning's efforts to further develop the SEA program and appreciate the boundary adjustments that were made based on our previous comments (e.g., near the Pomona Water Reclamation Plant). Our current comments are noted below. The Districts are willing to share GIS shape files of our facility boundaries to support Regional Planning's revisions to SEA boundaries.

1. Lancaster Agricultural Site. Figure 1 depicts property that Sanitation District No. 14 has developed or intends to develop for agricultural operations using recycled water. The smaller portion labeled A is a site developed with a recycled water storage tank and pump station to serve the agricultural site. We request that the SEA boundary be adjusted to exclude the red hatched areas, which are part of the agricultural site or its supporting facilities.
2. Palmdale Water Storage and Agricultural Sites. Property developed for recycled water storage reservoirs is depicted in Area A on Figure 2. As an existing use, this area should be removed from the SEA boundary or exempted as an existing use at the time the expanded boundary went into effect. Areas B and C on Figure 2 depict land purchased and designated for agricultural operations using recycled water. As these parcels were purchased as part of an approved Facilities Plan and EIR to serve a public need, we believe it would be inappropriate to add a SEA designation to this property now and potentially jeopardize the implementation of this approved public project. This request is consistent with Regional Planning's Conservation and Open Space Element Policy COS 1.4: *Promote the use of recycled water, where available, for agricultural and industrial uses and support efforts to expand recycled water infrastructure* (Chapter 4 at p.

27) of the May 2, 2013, Draft Antelope Valley Area Plan. The Districts requested these same adjustments in a comment letter dated August 30, 2007; however, the adjustments have not been incorporated in this iteration.

3. Valencia Water Reclamation Plant (WRP). The Valencia WRP is shown in Figure 3. We appreciate Regional Planning's prior efforts to retract the SEA boundary to exclude the Valencia WRP. We request small additional adjustments shown as red hatching to eliminate encroachment onto the Valencia WRP parcel. While the areas shown in green are conservation easements and will not be developed, we request that the SEA boundary not encompass those areas because the current proposed ordinance requires a SEA review process for any work on a parcel that has even a minute coverage by a SEA. Requiring such SEA reviews for an active water reclamation plant would not be in the public's best interest.
4. Calabasas Landfill. The active Calabasas Landfill is shown in Figure 4. We appreciate Regional Planning's prior efforts to adjust the SEA boundary to exclude the Calabasas Landfill. We request a slight adjustment to the proposed SEA boundary (shown hatched in red) so that the boundary does not encroach on landfill property.
5. Whittier Narrows WRP. The Whittier Narrows Water Reclamation Plant is shown in Figure 5. We request that the red hatched area be removed from the proposed SEA boundary. Without such adjustment, any work on this active WRP would require SEA review under the current proposed ordinance and such reviews would not be in the public's best interest.
6. Puente Hills Landfill. The Puente Hills Landfill is shown in Figure 6. While this landfill has stopped receiving waste, there will be ongoing maintenance and post-closure construction projects for years to come. Similar to previous comments, we request that the red hatched area be removed from the proposed SEA extents so that SEA does not encroach on landfill property and trigger SEA reviews for routine work onsite.
7. General Comment Regarding Extent of Proposed SEA Boundaries. We wish to reiterate our prior request that boundaries be drawn more precisely and exclude areas where a high percentage of the land has been developed or otherwise previously disturbed. Designating previously disturbed areas as a SEA would require users of the land to go through a site plan review. These efforts require time and resources by both the applicant and the County that are not justified given that the potential significant ecology resources no longer existing due to prior disturbance. While the intent of the Type A CUP (§22.52.2935) seems to be a less rigorous review process for such properties, we believe that the current proposed process is too burdensome. For example, the Type A CUP requires a site visit by a biologist, a determination (\$503), site plan review (\$945), and hearing officer review (\$8,619). We believe the process should be simplified to: (1) the applicant furnishing some sort of proof (e.g., dated aerial photographs) that the portion of the property where work is to take place was disturbed prior to the date that the land was added to the SEA, and (2) Regional Planning staff reviewing the veracity of the proof.
8. Developed Area Exemption (§22.52.2915.2). The Districts agree that projects located entirely within developed or disturbed areas are appropriate permitted uses. However, to best use public resources, such projects should be exempt or required to go through a simple process to verify the location within a previously disturbed area. With the wide availability of aerial imagery including Google Street View, Bing oblique imagery, and high quality imagery available from the Los Angeles Regional Imagery Acquisition Consortium (LARIAC), applicants and County staff could usually verify the disturbed status of a parcel without physically visiting the site. As currently worded, such projects would require a site plan review which would require application

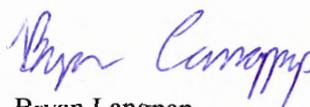
preparation, application review, and a mandatory site visit by a County biologist. These efforts require time and resources by both the applicant and the County that are not justified in most cases.

9. Public Facilities Exemption. Reference §22.52.2910. The Districts believe that public projects that have been approved and have a recorded, valid CEQA document prior to the effective date of the ordinance should be exempt where such projects were not within a SEA prior to their approval. Such projects would already have gone through a public process where the impacts to biological resources were considered and appropriate mitigation was identified. To add a new discretionary approval after a public decision to proceed with the project was already made does not seem appropriate.
10. Requiring SEA Review for Work Proposed Outside a SEA but on a Parcel Containing a SEA (§22.08.190). The existing SEA ordinance only requires a SEA review when proposed work would occur within a SEA. Under the existing process, our understanding is that the County can confirm that proposed work is outside a SEA boundary while reviewing entitlements. The proposed change that a SEA review is required whenever work is proposed on a parcel containing a SEA regardless of whether the work would occur in the SEA would create much additional cost and time impacts for SEA review while the potential benefit to the significant ecological area appears to be limited.
11. Agricultural Developed Areas (§22.52.2915.3). The 2007 draft SEA ordinance identified these regions as agricultural opportunity areas. The Districts has queried Regional Planning's on-line GIS-NET3 and determined that many of our properties designated for agricultural operations (see green hatched in Figure 2) are not identified as Agricultural Developed Areas. We request that the subject parcels either be removed from the SEA or designated as agricultural developed areas.

If you have any questions regarding this comment letter, please contact Wendy Wert at (562) 908-4288, extension 2737, or by e-mail at [wwert@lacs.org](mailto:wwert@lacs.org).

Very truly yours,

Grace Robinson Hyde



Bryan Langpap  
Supervising Engineer  
Planning Section

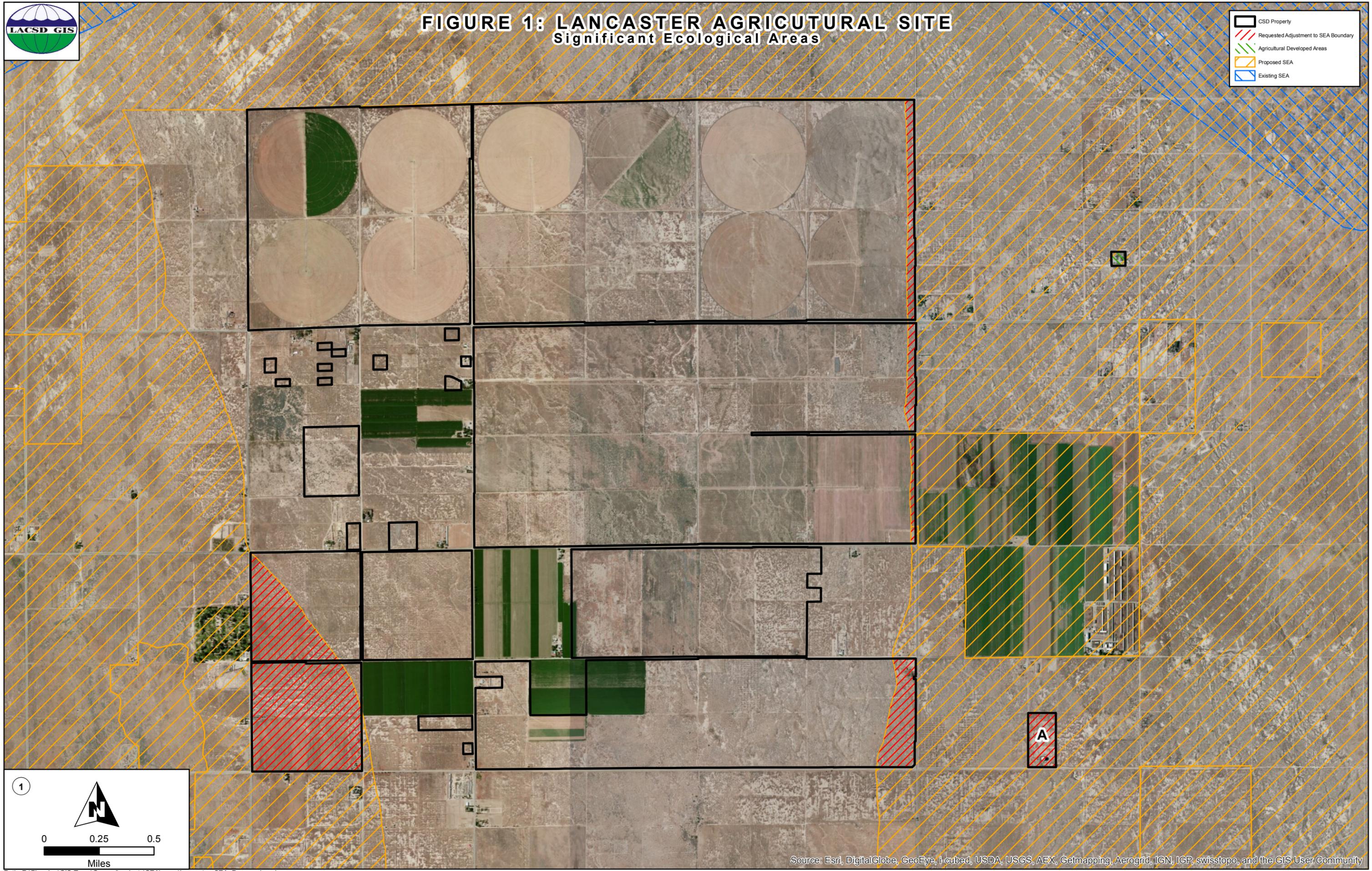
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Enclosures



**FIGURE 1: LANCASTER AGRICULTURAL SITE**  
Significant Ecological Areas

- CSD Property
- Requested Adjustment to SEA Boundary
- Agricultural Developed Areas
- Proposed SEA
- Existing SEA



1

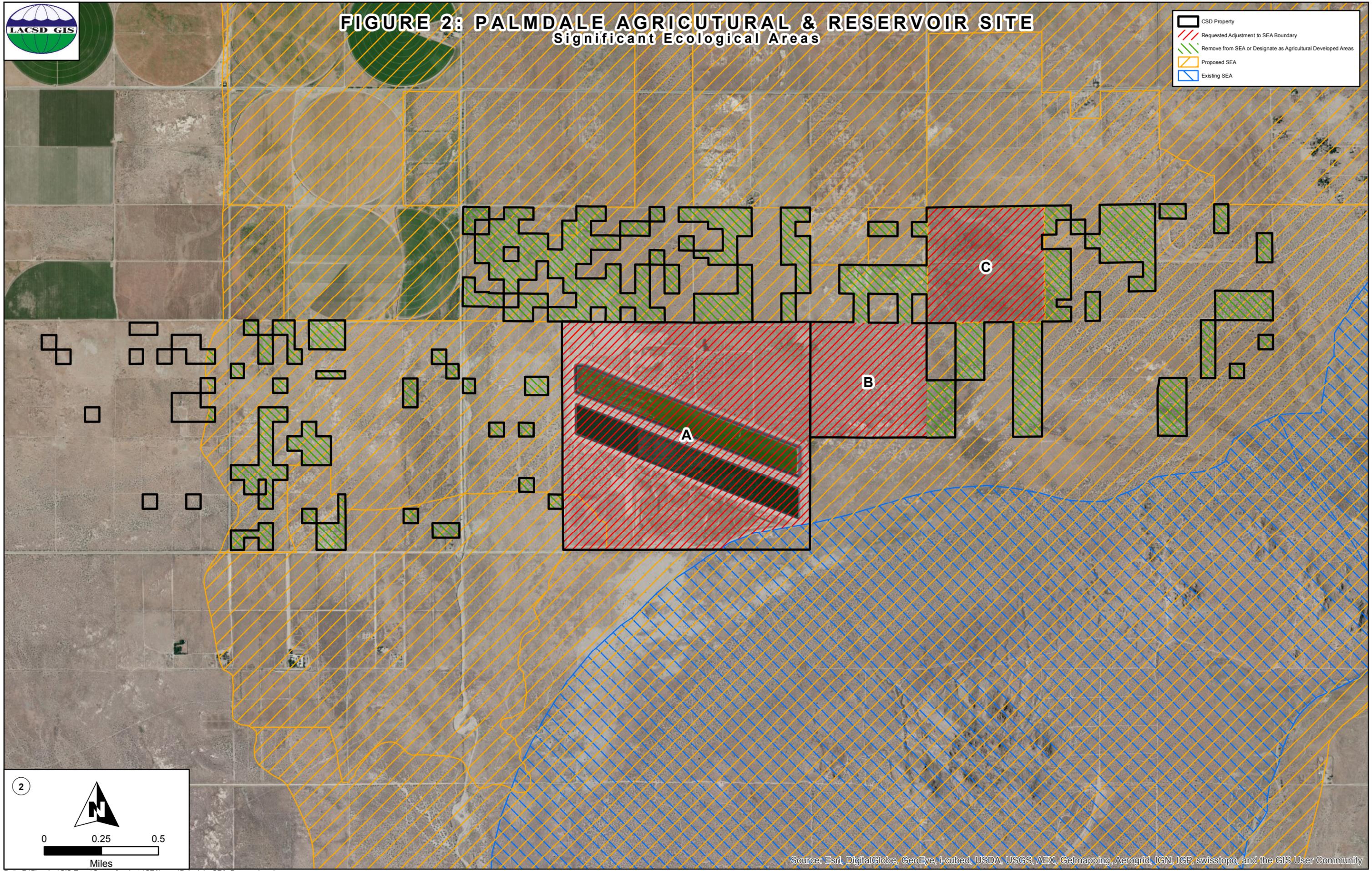
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# FIGURE 2: PALMDALE AGRICULTURAL & RESERVOIR SITE

## Significant Ecological Areas

- CSD Property
- Requested Adjustment to SEA Boundary
- Remove from SEA or Designate as Agricultural Developed Areas
- Proposed SEA
- Existing SEA



2

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Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community



**FIGURE 3: VALENCIA WATER RECLAMATION PLANT**  
Significant Ecological Areas

- Valencia WRP
- Requested Adjustment to SEA Boundary
- Conservation Easement
- Proposed SEA



3

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**FIGURE 4: CALABASAS LANDFILL**  
Significant Ecological Areas

Legend:

- Landfill Property (black outline)
- Requested Adjustment to SEA Boundary (red hatched area)
- Proposed SEA (orange hatched area)



Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community



**FIGURE 5: WHITTIER NARROWS WATER RECLAMATION PLANT**  
Significant Ecological Areas

Legend:

- CSD Property
- Requested Adjustment to SEA Boundary
- Proposed SEA



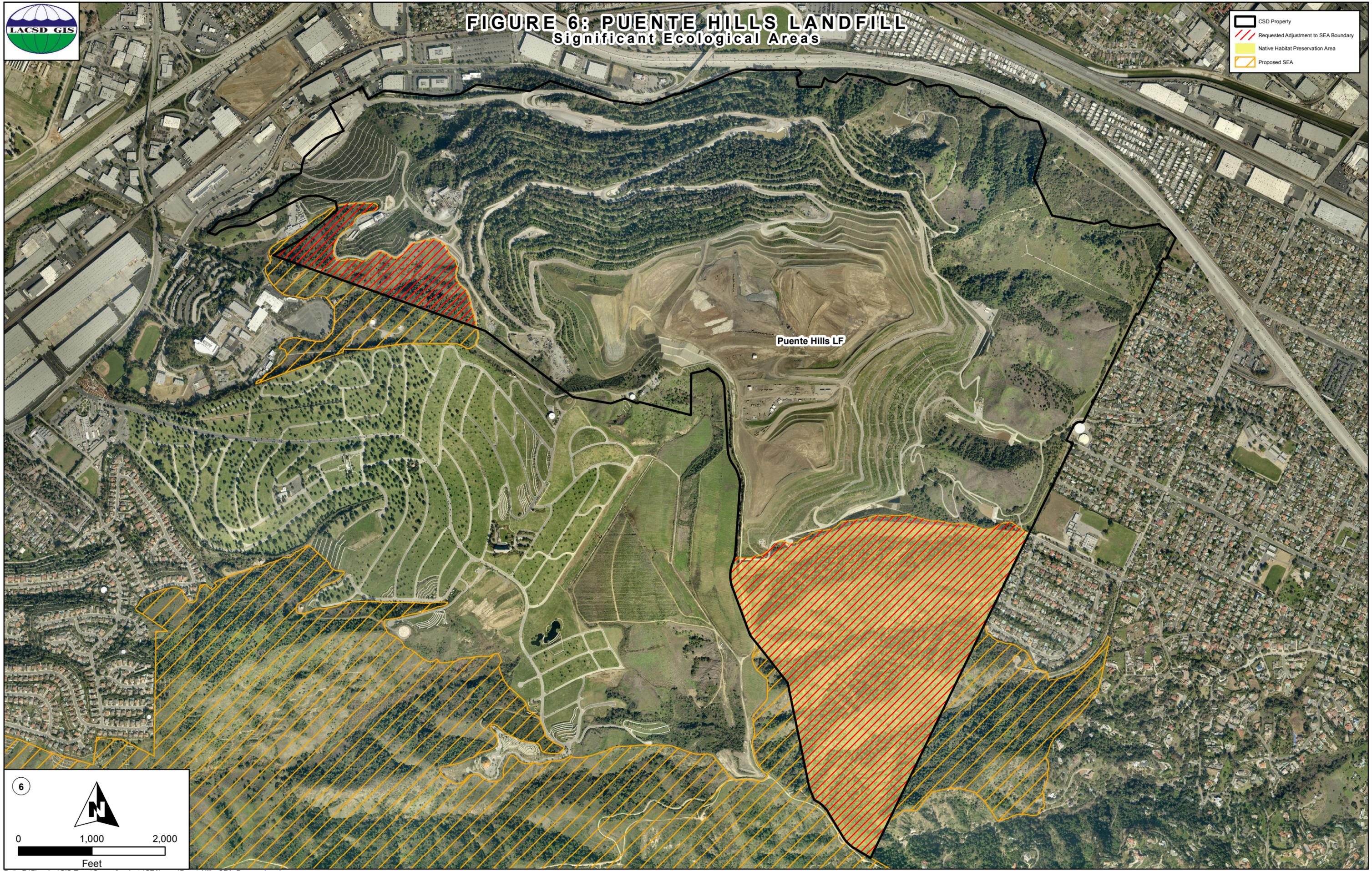
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**FIGURE 6: PUENTE HILLS LANDFILL**  
Significant Ecological Areas

- CSD Property
- Requested Adjustment to SEA Boundary
- Native Habitat Preservation Area
- Proposed SEA



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