



*protecting and restoring natural ecosystems and imperiled species through
science, education, policy, and environmental law*

submitted via email and USPS

7/23/2014

Emma Howard
Regional Planning Department
Room 1354
320 W. Temple Street
Los Angeles, CA 90012
ehoward@planning.lacounty.gov

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

Dear Ms. Howard,

On behalf of the Center for Biological Diversity's (Center) 775,000 staff, members and online activists we submit the following comments on the Draft SEA Connectivity and Constriction Map – April 2014 and Significant Ecological Areas Ordinance Update – Draft 5. The Center is a national, nonprofit organization whose mission is to protect and restore endangered species and their habitats through science, policy, education, advocacy, and environmental law. Many of the Center's members and supporters reside in Los Angeles County and have a keen interest in retaining the incredible biological diversity that remains in Los Angeles County. The Center's members and staff regularly visit publicly accessible lands within the SEAs for purposes of research, photography, hiking, enjoyment of these rare areas and other recreational, scientific, and educational activities.

We support the update of the identification of SEAs and the ordinance to better protect the rare and endangered species and habitats that call Los Angeles County home. We offer the following comments on the Draft SEA Connectivity and Constriction Map – April 2014 and the Significant Ecological Areas Ordinance Update – Draft 5.

Draft SEA Connectivity and Constriction Map – April 2014

We generally support connecting important wildlife habitat areas through wildlife linkages and connectivity corridors. Under Draft 5 of the SEA Ordinance, the Connectivity Areas are proposed to be between 1500-700 feet in width and the Constricted Areas only 700 feet or less (SEA Ordinance Draft 5 at pg.4 and 5 respectively). These proposed widths for the connectivity and constriction linkages do not align with the most recent conservation biology science. Different species require different connectivity designs. Current connectivity designs rely on connectivity strands of 2 km to minimize edge effects and support long-term occupancy of the corridor by less-mobile species that may require generations to move their genes between "core areas". For many species, a wide linkage helps ensure availability of appropriate habitat, host

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plants (e.g., for butterflies), pollinators, and areas with low predation risk. In addition, fires and floods are part of the natural ecological regimes and a wide linkage allows for a semblance of these natural processes to operate with minimal constraints from adjacent development areas. Wider linkages also enhance the ability of the biota to respond to climate change, which is essential to consider in planning these days, and buffer against edge effects. Therefore, we request that where connectivity is not already constrained by existing development, that the scientifically supportable linkages be identified to achieve the goals of the SEA program. This approach is particularly viable and important in the northern part of the County, where corridors and linkages are still currently available to be preserved. Their establishment now will sustain the existing conservation investments over the long-term.

Indeed the County should incorporate the work that has been done by independent scientists on connectivity in Los Angeles County, including the work by SC Wildlands which identified key connectivity corridors in the following areas:

- South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion ¹
- South Coast Missing Linkages: A Linkage Design for the Santa Monica-Sierra Madre Connection²
- South Coast Missing Linkages: A Linkage Design for the Sierra Madre-Castaic Connection³
- South Coast Missing Linkages: A Linkage Design for the San Gabriel-Castaic Connection⁴

While we recognize that some of these key linkages have been captured by the proposed SEAs, not all of them have been.

Significant Ecological Areas Ordinance Update – Draft 5

The Draft 5 SEA Ordinance (Draft 5) is a good first step to assist in maintaining Los Angeles County’s world-class natural heritage. We support many of the land use planning proposals discussed in the Endangered Habitats League letters dated February 3, 2014 and February 21, 2014 and urge the County to incorporate similar measures as San Diego County into the planning process including density limits and clustering, which appear to be lacking in Draft 5.

We offer the following document specific comments:

Pg. 8 – “Removal or thinning of vegetation for fire or public safety,...”. Where clearance of vegetation is needed for fire or public safety, these areas need to be identified as part of the “developed” area, and included in the project “footprint” because thinning of vegetation often results in degradation of habitat from non-native plants and often causes “type conversion” to another vegetation type over the long-term. It appears this issue may be addressed on Pg 16 which states “New structures and infrastructure requiring areas of brush clearance shall not be located in such a way that any portion of the required areas includes dedicated open space areas

1 <http://www.scwildlands.org/reports/SCMLRegionalReport.pdf>

2 http://www.scwildlands.org/reports/SCML_SantaMonica_SierraMadre.pdf

3 http://www.scwildlands.org/reports/SCML_SierraMadre_Castaic.pdf

4 http://www.scwildlands.org/reports/SCML_SanGabriel_Castaic.pdf

on the lot or parcel of land or on adjoining or adjacent lots or parcels of land. In addition, such structures or infrastructure shall not be located in a way that any portion of the required areas of brush clearance will include undisturbed natural areas on adjoining or adjacent lots or parcels of land.” However, greater clarity should be provided between these sections.

Pg. 16 – Construction. We believe additional state and federal regulations need to also be included, including but not limited to:

- Section 1600 et seq. permits (Streambed Alteration Agreements);
- Section 2081 Permit (State-listed endangered species);
- Regional Water Quality Control Board (RWQCB) permits;
- Waste Discharge Requirements;
- National Pollutant Discharge Elimination System (NPDES) Construction General Permit; and
- General Construction Stormwater Permit (Preparation of a SWPPP)

Pg. 28 – The unnamed table that describes the “Percent Area of Entire County SEA Proposed By Development Proposal” and the “Acreage Value” needs to be rethought. Under this scenario, for large SEAs, multiple small projects would require no or very few acres of natural open space to be set aside. Cumulatively, these projects could significantly degradation of the SEA – death by a thousand cuts scenario. Fragmentation of habitat is one of the leading factors in habitat degradation and species elimination and the proposal as written could result in destroying the very resources it set out to protect.

Pg 28-29 iii. 1-5 – Folding in basic conservation biology tenets into this section would better achieve the purpose for which the SEAs are established. Basic tenets include:

- Species well distributed across their native range are less susceptible to extinction than species confined to small portions of their range;
- Large blocks of habitat, containing large populations are better than small blocks with small populations;
- Blocks of habitat close together are better than blocks far apart;
- Habitat in contiguous blocks is better than fragmented habitat;
- Interconnected blocks of habitat are better than isolated blocks;
- Populations that fluctuate widely are more vulnerable than populations that are more stable;
- Disjunct or peripheral populations are likely to be more genetically impoverished and vulnerable to extinction, but also more genetically distinct than central populations⁵

These basic tenets become even more important in the context of climate change, where all species need to have the opportunity to try to move and adapt to the changing climatic conditions.

Pg. 36 – Appendix for Part 2B. This appendix treats chaparral as a single plant community, when indeed chaparral is a series of complex and varied plant communities. The appendix does recognize redshank chaparral as a unique type of chaparral, but there are others. We urge the County to recognize other types of chaparral and focus conservation on the unique ones. As the

5 Noss et al. 1997. Science of Conservation Planning. Island Press, Washington D.C. pgs. 93-104.

County is aware, frequent fire “type converts” chaparral (often into non-native plant communities), so maintaining a diversity of “old growth” chaparral, mid-aged and “young” chaparral will not only provide a mosaic of chaparral habitats for species in the county, but also retain the diversity of chaparral age-stands found in Los Angeles County.

Regarding the red shank chaparral, this unique chaparral type reaches its northern most edge of its range in Los Angeles County. These peripheral populations at the northern edges of their ranges are unique and of great importance especially as climate change models predict migration will be needed to higher latitudes and elevations.

Also in the Appendix, the coastal sage scrub community is rated as “medium habitat value”, when indeed coastal sage scrub has been highly impacted from development, invaded by non-native species and is home to some of the most rare species in the County. Coastal sage scrub has been the focal habitat for all of the Natural Communities Conservation Plans in coastal southern California because it is a highly imperiled habitat type and the ordinance will be improved by reflecting the status of this important and declining plant community.

Conservation Planning

While it remains unclear if the County will be signatory to the Desert Renewable Energy Conservation Plan (DRECP), we know the County has been a participant in the planning process. We also believe that the County’s existing and proposed SEAs are very likely to be included as conservation areas under the DRECP. Therefore adopting appropriate planning now to facilitate conservation is timely.

While we recognize that much of Los Angeles County has been converted to development, the remaining areas become that much more valuable to retain and showcase the County’s rich natural heritage. Thank you for the opportunity to comment on these issues. Please keep me informed of issues related to this process at the contact information above.

Respectfully submitted,



Ilene Anderson
Senior Scientist
Center for Biological Diversity



Preserving Everyone's Heritage for all Generations

P.O. Box 1041 Malibu, CA 90265 Tel: 323 345-1555 Fax: 310 456-3380
www.wanconservancy.org

July 30, 2014

Esther L. Valadez, Chair
Regional Planning Commission
300 West Temple St., 13th Floor
Los Angeles, CA 90012

RE: Item 6d, August 6, 2014: Significant Ecological Areas Program- Support

Dear Chairperson Valdez and Members of the Commission:

On behalf of the Western Alliance for Nature, I am asking you to protect the natural heritage of Los Angeles County by expanding the Significant Ecological Area (SEA) boundaries to more closely approach the actual natural areas of LA County. These areas need increased protection as they are the only areas remaining of much larger and ecologically important habitat areas. LA County is still lucky enough to have areas where, in spite of the urbanization of the County, wildlife still exists. These areas not only are home to an amazing array of wildlife, but provide important places where people can go to enjoy their beauty and escape from the pressures of urban life. The biological diversity of the natural areas of LA County is one of the greatest in the Continental United States but that diversity will continue to degrade unless the SEAs are expanded to provide protection for sufficient area necessary for this wildlife to exist and to create wildlife linkages, so critical to maintaining healthy populations.

We ask you to be certain to make the expanded SEAs and connectivity of these areas a major emphasis of your planning during the new General Plan process.

Yours truly,

Sara Wan
Executive Director

From: Will
Sent: Wednesday, July 30, 2014 5:06 PM
To: Rosie Ruiz; Emma Howard
Subject: Significant Ecological Areas (Item 6d, Aug. 6, 2014) – SUPPORT

Dear Chairperson Valadez and Members of the Commission:

I ask you to protect the irreplaceable natural heritage of Los Angeles County through *expanded* Significant Ecological Area (SEA) boundaries. The SEAs are the only home left for our remaining wildlife and provide beauty and enjoyment for people. The expanded SEAs have been developed through a sound scientific process, and are needed to balance the major growth called for in the new General Plan. Besides expansion, in order to make SEAs stronger, connectivity should be added as a defining factor.

We also need a revised SEA Ordinance that is both efficient for applicants and effective for resource protection. Finally, please look to innovative implementation mechanisms such as density transfers and comprehensive agreements with landowners.

Please take the long view and make sure that nature is able to survive climate change and the other challenges it faces. Expanded SEAs are our best and only hope.

Thank you.

Sincerely,

William Dane
301 E Cedar St Apt 84
Ontario, CA 91761

July 18, 2014

Emma Howard
ehoward@planning.lacounty.gov
LA County Department of Regional Planning
320 W Temple Street, Room 1354
Los Angeles, CA 90012

Re: Comments Draft 5 of the Significant Ecological Area (SEA) Ordinance

Dear Emma'

As we discussed previously, earlier this year I became the Superior Court of the State of California for the County of Los Angeles appointed Referee in Partition for the land holdings more commonly known as the Temescal Ranch, which is located in northwestern Los Angeles County. In that capacity and amongst a number of other various responsibilities lies my responsibility to insure that no additional encumbrances are placed on the property. To that end I am submitting my comments to Draft 5 of the Significant Ecological Area (SEA) Ordinance dated April, 2014.

I would acknowledge that each draft of the above referenced ordinance has improved in some form or another, especially with respect to applicability. That said, however, there remain a number of issues that are of great concern to the ownership of the Temescal Ranch, not limited to those enumerated below.

- The ordinance appears to overreach existing requirements under CEQA, and other state and federal regulations, as well as instituting a completely burdensome and quite complex process that any future applicant will go through that in large measure restricts and removes the elected Supervisors' land-use discretion and authority.
- SEATAC manual remains inconsistent with CEQA on a number of issues, and there is no procedure given as to how the SEATAC process would integrate with existing CEQA processes. The implementation of the current approach will result in duplicative reports and findings in any effort to obtain CEQA clearances in the future.
- The ranch land, if ultimately designated as being almost entirely within an SEA will not be able to remove that designation without obtaining a CUP as well as a General Plan Amendment in order to alter the boundary.
- As the Temescal Ranch has been rather arbitrarily placed within the Santa Felicia SEA as indicated above, the proposed SEA Ordinance permits the use of LA County's land use authority to stop all future development on the ranch, and does not address any mitigation opportunities which may be available in order to address environmental impacts. Effectively this ranch may not be capable of any future or further development, which appears to be contrary to law.
- This draft includes language related to ecological transition areas and connectivity areas, which appear to expand land which may be subject to this proposed SEA ordinance. Additionally

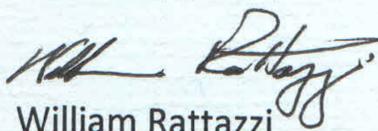
there are a number of inconsistencies apparent in the reading of Sections 22.52.2905, para; B, C and E, in relation to 22.52.2925, para F as to the dimensions that such areas may have or how development may be or may not be located within such areas. For example as development areas have been defined as including "access roads" , and on a ranch of the size of the Temescal Ranch access roads are located throughout the ranch, are we then no longer permitted to maintain viability of these roads for fire access as well as ongoing and historically consistent ranch operations.

- With ongoing and historically consistent cattle operations, as well as other farm operations throughout the ranch, we do not understand why this ordinance:
 - seeks to prohibit barbed wire fencing in an SEA area where cattle operations are ongoing.
 - Prohibits brush clearance mandated by the Fire Department, without compliance with various tenets of the proposed ordinance.
 - Does not adequately address, nor appear to be consistent with Draft No. 2 of the Renewable Energy Ordinance.
- Under Section 22.52.2915, Permitted Uses, the current language in subsection A must be further clarified, especially the term "coordinated effort as determined by the Director". Additionally under subsection C, development appears to be limited to 10% of the gross area of a parcel/lot, not to exceed 3 gross areas. The Temescal Ranch contains 20 legal parcels with an average size of over 300 acres each. The current language in the proposed ordinance limits the total development of any kind within the boundaries of the ranch to less than one tenth of one percent of the land holding in total, or effectively constituting a taking under the law.

Finally I would ask one question of this current draft ordinance; what are the intended goals of such ordinances? If they are to effectively prohibit the construction of any further development in a number of areas of unincorporated Los Angeles County, then they will be successful. If, however they are intended to provide a framework and guideline for moving forward with appropriate and sensitive development that will meet the demands of future housing and economic development of a viable county, they must be reconsidered, redrafted, and re-proposed, and I would urge the Department of Regional Planning to do so at this time.

Thank you for your consideration in this regard, and I look forward to the continued hearing in August.

Very truly yours;



William Rattazzi

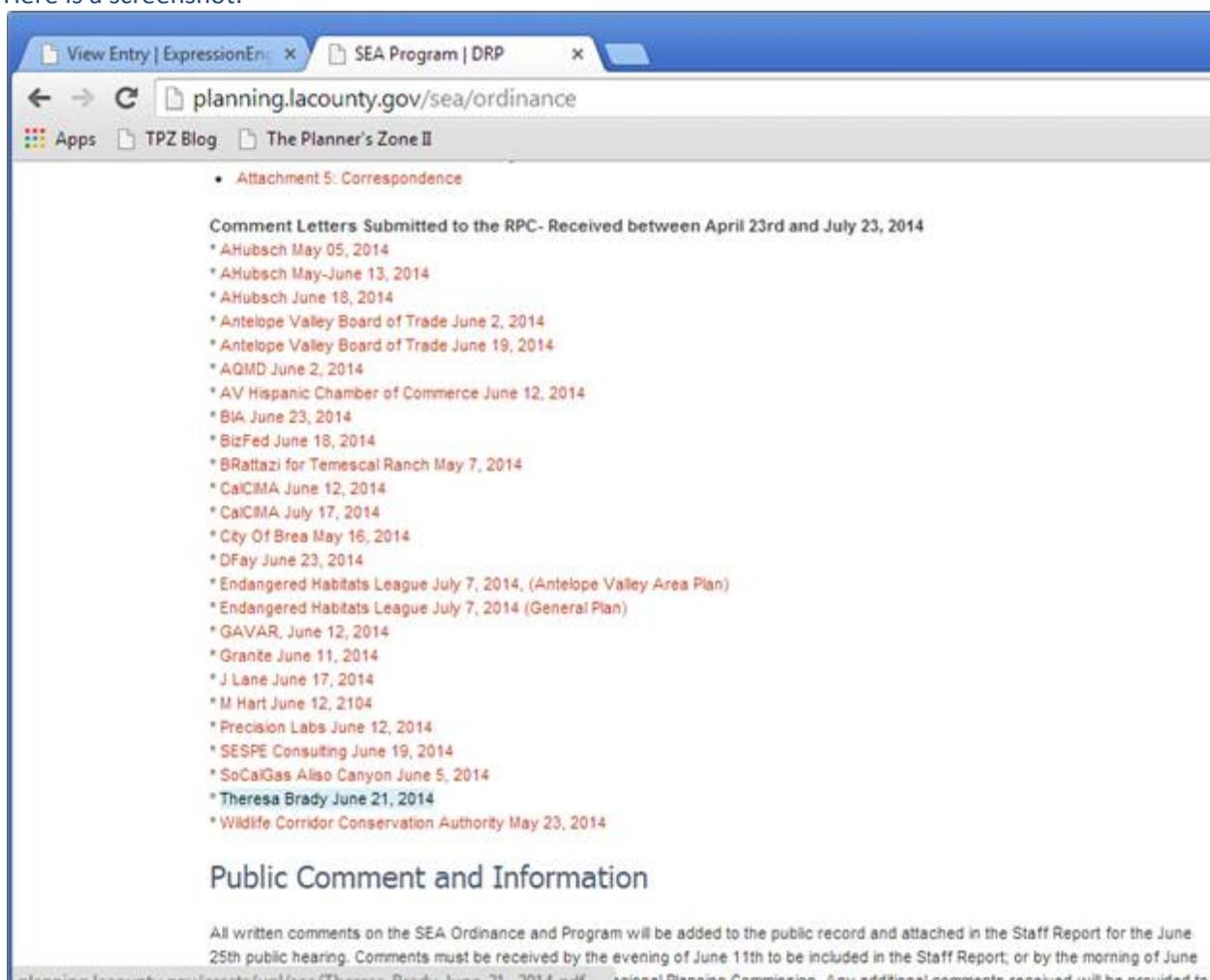
Referee in Partition

From: Emma Howard
Sent: Thursday, July 31, 2014 9:20 AM
To: 'Theresa Brady'
Subject: RE: Department Recommendations on SEA Boundary Changes and Reminder of August 6th RPC Hearing

Theresa,

Your comments went into the comments package to the RPC and are also posted on our webpage at: <http://planning.lacounty.gov/sea/ordinance>. As your comments were not a request to change the SEA Boundaries, we didn't consider it in our request package, but we certainly did note your comments and appreciate them.

Here is a screenshot:



Thank you for your comments on the SEA Program and support of the proposed Santa Susana Mountains and Simi Hills SEA.

Regards,
Emma Howard

*Emma Howard
Regional Planner
Community Studies North Section
Department of Regional Planning
<http://planning.lacounty.gov/sea>
Telephone: 213-974-6476*

From: Theresa Brady
Sent: Wednesday, July 30, 2014 10:50 PM
To: Emma Howard
Subject: Re: Department Recommendations on SEA Boundary Changes and Reminder of August 6th RPC Hearing

I thought I made comments on keeping the SEA of Santa Susana Simi Hills intact. I see recommendations from others about the SEA to protect the Mormon Creek. However in your recommendations I only see comments from the Termo company accepted on this area. Can you explain?

-----Original Message-----

From: Emma Howard
Sent: Jul 30, 2014 2:10 PM
To: Jennifer Robinson , Hillary Gordon , George Watland , Marcia Hanscom , Eric Johnson , Joan Licari , Theresa Brady
Subject: Department Recommendations on SEA Boundary Changes and Reminder of August 6th RPC Hearing

Hello Ms. Licari,

We wanted to let you know that our Department has made our recommendations in response to your comments on the proposed Significant Ecological Areas and Coastal Resource Areas Map, a component of the [Los Angeles County General Plan 2035](#).

Your request is #14

Our recommendations are in the [recommendation spreadsheet](#) on our webpage at <http://planning.lacounty.gov/sea/ordinance>. Our submittal to the Regional Planning Commission includes any of your [original comments](#) as well. Links for the full staff report are provided below:

[SEA Staff Report July 24, 2014](#)

[Attachment 1: Excerpt of the 2000 SEA Update Study](#)

[Attachment 2: SEA Boundary Comments and Recommendation Spreadsheet](#)

[Attachment 3: Principles for Adjusting SEA Boundaries](#)

[Attachment 4: Individual SEA Boundary Comments](#)

[Attachment 5: Correspondence](#)

We will be presenting these recommendations next week on Wednesday August 6th at a public hearing of the Regional Planning Commission. The meeting will begin at 9 am and is held in Room 150 Hall of Records

320 W. Temple Street Los Angeles, California 90012. You are welcome to participate with public comments.

When we have finished the hearing, we will send you a personalized letter that includes information to show what changes we have made to the SEA Map. Following that, we will not be returning to the Commission on the rest of the SEA program until the fall of 2014, anticipated hearing date of October 8, 2014. The proposed SEA Map will remain a draft until the Board of Supervisors approves the draft General Plan and SEA Program at public hearing, which will not happen until after the after the Regional Planning Commission hearings.

Please give me a call if you have further questions. Our offices are open Monday through Thursday and I can be reached between 8 am and 5:30 pm.

Regards,
Emma Howard

Emma Howard
Regional Planner
Community Studies North Section
Department of Regional Planning
<http://planning.lacounty.gov/sea>
Telephone: 213-974-6476

July 16, 2014

Connie Chung, AICP, Supervising Regional Planner
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

Comments on Draft Environmental Impact Report for the Los Angeles County General Plan Update

Dear Ms. Chung:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR; SCH#2011081042) for the Los Angeles County General Plan Update (General Plan Update) dated June 19, 2014.

The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to its mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency endeavors to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority owns and or manages over 3,800 acres which lie within the Cities of Whittier and La Habra Heights, as well as in the County unincorporated areas of the Puente Hills known as Hacienda Heights and Rowland Heights.

Please accept the following comment regarding impact 5.4-4 "The Proposed Project would affect wildlife movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites".

Due to the importance of wildlife corridors and nursery sites, please consider requiring additional mitigation measures, especially if the Project is in a Significant Ecological Area (SEA), in order to mitigate a Project to Less Than Significant.

It is clear from the language in the Draft General Plan that wildlife movement corridors and habitat connectivity are critical to the concept of SEAs. Appendix E of the General Plan Update acknowledges the importance of wildlife corridors and natural resources stating "Biological resources are important in a regional context, serving to connect resources in adjacent local jurisdictions. Critical biological resources are maintained through habitat connectivity, which sustains population genetic diversity, and provides refuge for migrant species." The SEA Designation Principles of this appendix also state that the intent of SEAs are to provide habitat linkages between core habitats.

However, the DEIR determined that even with mitigation measure BIO-1 and updates to the SEA Ordinance, certain projects may not be able to avoid or minimize impacts and do not provide mitigation for loss of wildlife movement or nursery sites. Due to the County's recognition of the importance of wildlife corridors, please exhort efforts to mitigate impacts to regional wildlife linkages and nursery sites to Less Than Significant.

We appreciate the opportunity to comment on the DEIR for the Los Angeles County General Plan Update. Please notify us when related documents are available for public review.

Thank you for your consideration of our comments. Feel free to contact me or Lizette Longacre, Ecologist, at (562) 945-9003 for further discussion.

Sincerely,

A handwritten signature in black ink that reads "Bob Henderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bob Henderson
Chairman

cc: Board of Directors
Citizens Technical Advisory Committee

From: Martin Byhower
Sent: Wednesday, July 30, 2014 7:00 PM
To: Rosie Ruiz; Emma Howard
Subject: Significant Ecological Areas (Item 6d, Aug. 6, 2014) – SUPPORT

RE: Item 6d, [August 6, 2014](#): Significant Ecological Areas Program—*SUPPORT*

Dear Chairperson Valadez and Members of the Commission:

I ask you to protect the irreplaceable natural heritage of Los Angeles County through *expanded* Significant Ecological Area (SEA) boundaries. The SEAs are the only home left for our remaining wildlife and provide beauty and enjoyment for people. The expanded SEAs have been developed through a sound scientific process, and are needed to balance the major growth called for in the new General Plan. Besides expansion, in order to make SEAs stronger, connectivity should be added as a defining factor.

We also need a revised SEA Ordinance that is both efficient for applicants and effective for resource protection. Finally, please look to innovative implementation mechanisms such as density transfers and comprehensive agreements with landowners.

Please take the long view and make sure that nature is able to survive climate change and the other challenges it faces. Expanded SEAs are our best and only hope. Thank you.

Martin Byhower

2309 247th St.

Lomita, CA

90717

From: Emma Howard
Sent: Thursday, July 31, 2014 9:10 AM
To: 'gaboon'
Subject: RE: Where have the SEA profile photos gone? Where is County Public Outreach to Altadena Re: its SEA?

Lori,

Thank you for your email. I will forward your comments along to the Regional Planning Commission and make sure my supervisor is aware of them. I am aware of the photo library pages that Julie Lowry made for the webpage, which were online. The individual SEA pages became challenging to maintain as we moved forward with updates after 2011. We have tried to simplify the webpage as much as we can to make sure that we can update it in a timely fashion. However you make a good point and I will look into what can be done to better profile the individual SEAs, or make the information load faster.

We will also make sure we put you back on the contact list. The formatting for these lists has changed over time, so thank you for letting us know that you need to be returned to the list. If there are other members of your community whose names I should have, please refer them to me. We've been working mostly through email notice, so email addresses would be the best contact information.

The meeting on the 6th is specifically to discuss certain specific requests for adjustments made by a few groups and individuals and clarify what our process is as a department as we evaluate any requests. We will not be finalizing the SEA Program on that date and there is still time to work on any additional issues. We anticipate that we will return to public hearing to finalize the Commission hearings on the SEA program on October 8th at the earliest, and following that there will need to be hearings at the Board of Supervisors. In the meantime, we'd be happy to talk with you further or meet to go over what changes have happened with SEA Program after Julie.

So far no one had requested any changes be made to the Altadena Foothills and Arroyos SEAs and we have not made any either. I look forward to speaking with you. I'll be busy up till the date of the hearing, but if you have time to schedule a phone chat anytime after you come back from your travels, I work Monday through Thursday and I can schedule a phone call anytime between 8am and 5:30 pm.

Regards,
Emma Howard

*Emma Howard
Regional Planner
Community Studies North Section
Department of Regional Planning
<http://planning.lacounty.gov/sea>
Telephone: 213-974-6476*

From: gaboon
Sent: Wednesday, July 30, 2014 9:15 PM
To: Emma Howard
Cc: Sussy Nemer; Mitch Glaser
Subject: Re: Where have the SEA profile photos gone? Where is County Public Outreach to Altadena Re: its SEA?

To:

ehoward@planning.lacounty.gov

Emma Howard

Regional Planning Department, SEATAC Coordinator

320 W. Temple Street, Room 1354

Los Angeles, CA 90012

Dear Emma,

Many of us have worked hard since 2000 to establish and assure an **Altadena Foothills & Arroyos Significant Ecological Area (SEA)**. I wrote the nomination for the Altadena Foothills Conservancy (AFC) shortly after the organization was founded and I subsequently contributed many photos (along with neighbors) at substantial personal effort to illustrate the rich biodiversity of our region in the San Gabriel Mountain foothills that provides an east to west wildlife corridor adjacent to Angeles National Forest. That was at the request of Julie Lowry, Principal Planner for the SEAs at that time.

At one time, there was a lovely County SEA website that posted those photos (per an e-mail from Julie L. back in 2011, see excerpt below). Now I cannot find those web pages. What happened to those SEA profile pages that demonstrated to others the natural resources we hope to protect in our area? Other SEA photos were posted as well? The .pdf downloads for each SEA are inconvenient for many whose computer systems cannot handle large map or image files. Web-based pages are far more broadly accessible, but those appear to be missing? I could not even find the Altadena Foothills & Arroyos SEA page via Google search. Can you tell us where they've gone?

How can these last critical reviews of the SEAs be complete without posting native habitat and wildlife images from the proposed SEA sites?

For some reason, I apparently fell off the County SEA planning mailing list. I was just forwarded an alert today about the upcoming Planning Commission meeting on 6 August that I, unfortunately, cannot attend. I am very concerned that special interests such as hillside developers will be given undue weight while local residents that support the SEAs and preserving habitat and wildlife corridors are largely ignorant of the review schedule, partly because the General Plan / SEA process has literally dragged on for over a decade... and the web pages with easy to understand descriptions and images are no longer posted.

What public outreach in the proposed SEA areas has been implemented by the County to be sure that the review and public input re: proposed SEAs is fair and broad within our community?

I will be out of town during the upcoming 6 August Commission meeting, yet I was deeply involved in the proposal for the Altadena Foothills & Arroyos Significant Ecological Area (SEA). If I can fall off the e-mail notifications, anyone can. If it were not for the Endangered Habitats League alert (copied below), I would not know about the important SEA meeting next week. I hope the County will give high weight to our prior commitment and neighborhood

efforts to see this region's natural resources and very special wildlife habitat and corridors protected! I know our neighborhood is overwhelmingly unaware of the upcoming commission meeting and decision process after all the *years* of waiting for action on our own Altadena Foothills & Arroyos SEA.

Though I will post the following alert on our neighborhood website, I fear the notice is too little and too late for most local residents and conservation advocates to educate themselves re: the current status of the SEA proposals and to attend any critical planning hearings. Also, the so-called "public hearings" are scheduled at 9:00am on a work day and at a location that prevents many interested parties in Altadena, La Canada Flintridge and Pasadena from attending.

Thank you for your information and consideration of this matter.

Respectfully,
Lori

Lori Paul
626.798.3235
gaboon@sbcglobal.net
153 Jaxine Drive
Altadena, CA 91001

- - -

From: Julie Lowry <jlowry@planning.lacounty.gov>
Subject: LA County Significant Ecological Areas (SEA) Website
Date: July 29, 2011 4:39:13 PM PDT

The Proposed Significant Ecological Area Program website is now LIVE! <http://planning.lacounty.gov/sea/>

http://planning.lacounty.gov/assets/upl/sea/SEA_adopted_proposed_2014.pdf

The SEA Website is a public education outreach tool, which acts as a hub of SEA information. It provides details about the proposed SEA Program, summarizes the Program's 40-year history, and describes the County's biotic diversity and conservation planning principles, which underscore why the County is proposing large connected habitat and wildlife linkages as SEAs. Each SEA has a dedicated page that features a photo gallery of biological resources within that SEA, a detailed description of the area, and a PDF copy of the SEA Map with embedded biological resource data that can be turned on and off, downloaded and printed out by the user. Supporting biological studies, materials, and links related to each SEA are located at the bottom of each page. The Altadena Foothills and Arroyos SEA, San Andreas SEA, and Santa Monica Mountains SEA pages have the type of visually dramatic photo-documentation I am hoping will emerge for each SEA. A page is also dedicated to the draft SEA Ordinance (coming soon for public review) and identifies additional regulatory constraints within SEA boundaries, such as steep slopes and FEMA floodplains.

Thank you for the resources and input you have provided over the last decade...

As most of you know, I am leaving my position on August 1st to spend more time with my children, but know I am leaving the SEA Program in the capable hands of Emma Howard ehoward@planning.lacounty.gov, under the leadership of Mitch Glaser mglaser@planning.lacounty.gov. After August 1st, please direct any questions or comments to Emma and Mitch.

Best Wishes,
Julie

Julie Lowry
Principal Planner
General Plan Section
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012
<http://planning.lacounty.gov>
213-974-6423



Where are the photos?

ALTADENA FOOTHILLS & ARROYOS SEA
[DOWNLOAD the Altadena Foothills & Arroyos SEA Description \(2012\)](#)



click image to enlarge
Existing SEAs inside the Proposed SEA boundary: none, new SEA
Supervisorial District (s): 5
Incorporated Cities: La Canada Flintridge, Pasadena
Unincorporated Communities: Altadena, Angeles National Forest
[Download Altadena Foothills & Arroyos Criteria Table](#)

- - -

On Jul 30, 2014, at 5:07 PM, Ross Heckmann [arcadiawoodlands] wrote:

FYI.

Ross S. Heckmann

----- Forwarded message -----

From: **Endangered Habitats News** <dsilverla@me.com>

Date: Wed, Jul 30, 2014 at 4:59 PM

Subject: URGENT: Help save Significant Ecological Areas - With date correction

To: RossS.Heckmann@gmail.com

<jpeg.jpeg>2014 Alert #7

<jpeg.jpeg> <jpeg.jpeg>

URGENT ACTION ALERT

Save Los Angeles County

Significant Ecological Areas

Background

Unlike neighboring counties, Los Angeles has no comprehensive habitat preserve system. But for decades, it has depended upon a series of mapped "Significant Ecological Areas" in which development proposals are given special technical and planning scrutiny. SEAs range from oak woodlands to Joshua tree woodlands, from desert to chaparral.

With the current "2035 Update" of its General Plan, the Regional Planning Department is recommending a number of changes to the SEA system. First and foremost is a major expansion of the SEAs, as a result of a structured scientific review. While boundary revisions are needed in some locations, and there should be greater emphasis on connectivity, the expansion well reflects biological imperatives. Very importantly, the County is proposing to reduce housing densities within SEAs, which is crucial to limit the damage to natural resources.

Finally, through a revised ordinance that implements SEA protections, the County is seeking to clarify and streamline project approvals, with standardized procedures and

mitigation ratios. EHL has commented on ways to improve this ordinance. With major employment and residential growth envisioned in the new General Plan, especially in the Antelope Valley, SEA expansion and protection is an essential balance. See <<http://planning.lacounty.gov/sea/>> for further information.

Of note is that the comprehensive agreement negotiated by Endangered Habitats League and other groups for the Tejon Ranch in northern Los Angeles and Kern Counties has already advanced conservation goals and set much important habitat aside in association with limited development.

The threat

SEA expansion and the new ordinance are being vigorously opposed by the building industry and industrial interests. Misinformation in terms of scientific validity and scare tactics in regard to the effects of SEAs on proposed development are being utilized. There is a divided Board of Supervisors. *With an upcoming hearing on August 6, 2014 at the Planning Commission, it is vital to show support for this program.*

Action requested

We are asking people from all regions to respond and help Los Angeles County wildlife. Please write or email the Planning Commission and, if you can, testify at the hearing. *The conservation community must show it cares!* Here is a sample for letters and testimony. Please personalize.

*If possible, please send an email by **Thursday, July 31, 2014**.* In that case, your message will be provided *in advance* to the Commission. Otherwise, comments received up until August 5 will be distributed the day of the hearing.

Address correspondence to both: rruiz@planning.lacounty.gov,
ehoward@planning.lacounty.gov

Thank you



P.O. Box 931057
Los Angeles, California 90093

DRAFT

July 25, 2014

Emma Howard
Regional Planning Department Floor 13
320 W. Temple Street
Los Angeles, CA 90012
via email: ehoward@planning.lacounty.gov

Re: Los Angeles County Significant Ecological Areas Ordinance Update – Draft 5

Dear Ms. Howard:

Los Angeles Audubon is a California non-profit corporation with 501(c)(3) status, and a chapter of the National Audubon Society. We serve over 5,000 members and supporters in your district in the Los Angeles area. Our mission is to promote the enjoyment and protection of birds through recreation, education, conservation and restoration.

Thank you for the opportunity to comment on the March draft of the Significant Ecological Areas Ordinance.

U.S. Fish & Wildlife Service has identified 5 million birdwatchers and nature viewers in California who leave their homes to enjoy California's natural wonders.¹ The report identifies the economic benefits of trip-related and equipment related expenditures in 2011. While Los Angeles County is not broken out in this study, according to the total trip and equipment expenditures in the U.S. for the year 2011 the total amount is \$ 41 billion. Los Angeles County is a key destination for bird watchers from throughout the world.

In addition to consideration of the ecological and environmental benefits of the SEA ordinance, we suggest that the Commission also consider the economic benefits to the tourism, hospitality, transportation, and other economic sectors of Los Angeles County, as well as housing

¹ Birding in the United States: A Demographic and Economic Analysis, Addendum to the 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, U.S. Fish & Wildlife Service, Report 2011-1. <http://www.fws.gov/southeast/economicImpact/pdf/2011-BirdingReport--FINAL.pdf>

development, in sustaining and building on the current SEA program through the ordinance and the proposed expansion of lands identified in the program.

We think the County of Los Angeles has been wise, progressive and balanced in creating and implementing the SEA program that is not restrictive, allows development, but sets a higher standard of review in areas that play a key role in the ecology of our diverse habitats – ocean, coast, mountains, forests, grasslands, desert, agriculture, hillsides – that make Los Angeles County such a desirable destination for its citizens and others from around the world who come to enjoy scenic, natural open spaces and wildlife.

Specifically, within the draft of the ordinance, our comments are:

Section 2. Section 2208.190 – Definition of SEATAC

The ordinance should define a qualified “expert” as “local, independent, scientist with a graduate degree in ecology or one of the ecological sciences – ornithology, botany, etc – from an accredited school or university, and who does not have a conflict of interest.

Section 22.52.2905 Definitions.

A. “Agricultural Developed Area.” The definition should include a description that agricultural developed areas can provide nesting and foraging habitat for wildlife including fully protected species and sensitive species of birds.

F. “Habitat Preservation Area” should be defined as Natural Open Space Area of equivalent habitat value and in the same impacted area that will be provided to offset SEA Habitat Type Development.

K. “SEA Development Map” Agricultural Developed Areas within SEAS approved for development should be assessed for habitat value for wildlife including nesting and foraging habitat as well as natural areas.

Section 22.52.2915 Permitted Uses

Property may be used for the following, provided that an observed or likely to occur species of special status officially listed by the State or Federal Government as Endangered, Threatened, Rare or Sensitive is not discovered.....

Section 22.52.2920 Permitted Uses – Review Procedures

2. add Sensitive as above.

22.522925 Development Standards

2. Water Resources Setback. Setbacks should be determined by the largest Water Resource Size in the historical record, up to 100 years if possible, rather than at the time of inspection by Staff

Biologist. With predictions of increased and more lengthy drought periods in Southern California, development or project site analysis during these periods in order to minimize setbacks should not be incentivized.

22.52.2935 Uses Subject to Permits – Application Procedures.

(2) b. add or Sensitive as above.

22.52.2945 Uses Subject to Permits – Conditions of Approval or issuance.

d. Open Space Ownership and Management. This section should include provision of an endowment for management of the Natural Open Space.

Appendix for Part 28

2. Antelope Valley SEA

The SEA Ordinance should take this opportunity to re-evaluate the Habitat Value of Non-native Grassland. Much of the last remaining grassland in the Antelope Valley may be non-native or a mix of native and non-native. Grasslands should all have high value due to the loss of grassland habitat in the Antelope Valley.

15. Santa Monica Mountains

The SEA Ordinance should take this opportunity to re-evaluate the Habitat Value of Coastal Sage Scrub in the Santa Monica Mountains. World-renowned ecologist E.O. Wilson has named Southern California one of the top 18 biodiversity hot spots in the world, and Myers, et. al. recognized coastal California sage scrub as one of 25 worldwide hotspots in their notable paper Biodiversity hotspots for conservation priorities published in the journal Nature in 2000.

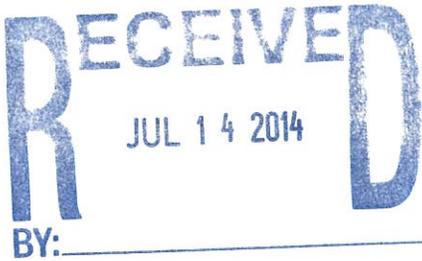
We thank you for the opportunity to provide these comments.

Sincerely,



Garry George
Conservation Chair
323-933-6660 p
garrygeorge@laudubon.org

KYLE & KYLE RANCHES, INC.



12345 East Avenue J
Lancaster, CA 93535
Phone (661) 946-1784
Fax (661-946-1514

July 11, 2014

Carl Nadela
Regional Planner, Los Angeles County
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

RE: Significant Ecological Areas and Land Density

Dear Mr. Nadela,

As per discussions we have had in the past, the current proposals for SEA's and land density restrictions will have significant impacts on our farming operation (as well as other farmers in our area) and land in general.

As we discussed in previous meetings, agriculture should be exempt from SEA's. In our meeting (with Jeff Siebert) we were informed that "disturbed" or farmed ground would be exempt from SEA's. I do not see any reference to that now being made.

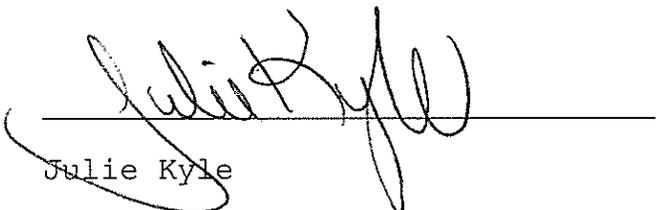
The proposed SEA's overlays are unfounded and are based on theory, not on science and need critical analysis. Where is the research based data that would support the massive SEA expansion? In addition, we are uncertain as to how the current

boundaries were selected as they appear to just be arbitrary boundary lines. We would like to know how the boundary lines were developed.

We are also disturbed by the acreage restrictions. Placing lot acreage restrictions, even at the 20 acre lot size, destroys property values and has a ripple effect on farm land in general (for example, devaluation of property value inhibits the ability to obtain financing for operating expenses). Our property in particular, is surrounded by lots cut primarily in 2 ½ acre lots and our property would be an island of large lots - this is an unfair restriction and conflicts with surrounding like property. What is this acreage restriction based upon? Property values are placed in jeopardy under this proposal.

The excessive down zoning and SEA's expansions are destructive and are of no benefit to the valley in general. Any analysis should have addressed the economic impact on individual parties.

Sincerely,



Julie Kyle

Kyle & Kyle Ranches, Inc.

cc: Emma Howard

From: john bradley

Sent: Wednesday, July 30, 2014 7:44 PM

To: Rosie Ruiz; Emma Howard

Subject: Significant Ecological Areas (Item 6d, Aug. 6, 2014) – SUPPORT

July 30, 2014

Dear Planning Commission Members:

We are writing as past residents of Los Angeles County, living for several years in the City of Long Beach. Although we currently live in the San Francisco Bay area, we left our hearts in southern California. We continue to visit the area frequently as we still have many family and friends there. As committed conservationists, we are asking you, as you make recommendations for the 2035 General Plan Update, to protect the remarkable and unique natural heritage of Los Angeles County through expanded Significant Ecological Area (SEA) boundaries. The SEAs are the only home left for our remaining wildlife and provide beauty and enjoyment for people. The expanded SEAs have been developed through a sound scientific process, and are needed to balance the major growth called for in the new General Plan. Besides expansion, in order to make SEAs stronger, connectivity should be added as a defining factor.

We also support the need for a revised SEA Ordinance that is both efficient for applicants and effective for resource protection. Finally, please look to innovative implementation mechanisms such as density transfers and comprehensive agreements with landowners.

Please take the long view and make sure that nature is able to survive human population growth and the other ecosystem resource challenges it faces. We believe that the proposed Expanded SEAs are our best and only hope. Thank you for your consideration.

Sincerely,

John and Becky Bradley

4958 Bosworth Court

Newark, CA 94560

From: Heather Wylie
Sent: Thursday, July 31, 2014 1:33 AM
To: Emma Howard
Subject: Fwd: Significant Ecological Areas (Item 6d, Aug. 6, 2014) – SUPPORT

July 30, 2014

Esther L. Valadez, Chair
Regional Planning Commission
300 West Temple St., 13th Floor
Los Angeles, CA 90012

RE: Item 6d, August 6, 2014: Significant Ecological Areas Program—SUPPORT

Dear Chairperson Valadez and Members of the Commission:

On behalf of my family, I ask you to protect the irreplaceable natural heritage of Los Angeles County through expanded Significant Ecological Area (SEA) boundaries. The SEAs are the only home left for our remaining wildlife and provide education, inspiration, beauty, enjoyment, improved health, and sustain the desirability of the area for people. The expanded SEAs have been developed through a sound scientific process, and are needed to balance the major growth called for in the new General Plan.

In addition to expansion, in order to make SEAs stronger, connectivity between SEAs must be added as a defining factor.

We also need a revised SEA Ordinance that is both efficient for applicants and effective for resource protection. Finally, please look to innovative implementation mechanisms such as density transfers and comprehensive agreements with landowners.

Please consider the legacy you will be leaving behind you and make sure that we pass on a heritage of nature that is able to survive climate change and the other challenges it faces. Expanded SEAs are our best and only hope. Thank you.

Sincerely,

Heather Wylie
(You likely remember me from my kayak trip down the LA River)

From: Gary Patton
Sent: Wednesday, July 30, 2014 5:23 PM
To: Rosie Ruiz; Emma Howard
Subject: Item 6d, August 6, 2014 / Significant Ecological Areas Program—SUPPORT

Esther L. Valadez, Chair

Regional Planning Commission

300 West Temple Street, 13th Floor

Los Angeles, CA 90012

RE: Item 6d, August 6, 2014 / Significant Ecological Areas Program—SUPPORT

Dear Chairperson Valadez and Members of the Commission:

I am writing you as a non-resident who cares deeply about the protection and preservation of remaining natural areas throughout California – including in Los Angeles County. I was a County Supervisor in Santa Cruz County for twenty years, and so I am familiar with the kind of land use regulations that will accomplish habitat preservation.

I am asking that you vote to protect the irreplaceable natural heritage of Los Angeles County through expanded Significant Ecological Area (SEA) boundaries. The SEAs are really the only home left for wildlife in Los Angeles County, and provide both beauty and enjoyment for people. The expanded SEAs have been developed through a sound scientific process, and are needed to balance the major growth called for in the new Los Angeles County General Plan. Besides expansion, connectivity should be added as a defining factor for SEAs.

I also urge your Commission to recommend that the Board adopt a revised SEA Ordinance that is both efficient for applicants and effective for resource protection.

Finally, please look to innovative implementation mechanisms such as density transfers and comprehensive agreements with landowners.

Thank you for taking the long view, and for helping to make sure that nature is able to survive climate change and the other challenges it faces. Expanded SEAs are our best hope. As a member of the Endangered Habitats League, I urge you to adopt the recommendations that EHL is making. I am confident that they are the best possible prescription for the future - for endangered habitats and for we human beings!!

Yours truly,

/s/ Gary A. Patton

Gary A. Patton

P.O. Box 1038

Santa Cruz, CA 95061

Website: www.gapatton.net



July 30, 2014

Esther L. Valadez, Chair
Los Angeles County Regional Planning Commission
300 W Temple St, 13th Floor
Los Angeles, CA 90012

**RE: Agenda Item 6d, August 6, 2014: Significant Ecological Areas Program
—SUPPORT**

Dear Chairperson Valadez and Members of the Commission:

The Endangered Habitats League (EHL) asks you to protect the irreplaceable natural heritage of Los Angeles County through *expanded* Significant Ecological Area (SEA) boundaries. For your reference, EHL is Southern California's only regional conservation group.

The SEAs are the only home left for our remaining wildlife and provide beauty and enjoyment for people. The expanded SEAs have been developed through a sound scientific process, and are needed to balance the major growth called for in the new General Plan. Besides expansion, in order to make SEAs stronger, connectivity should be added as a defining factor.

We also need a revised SEA Ordinance that is both efficient for applicants and effective for resource protection. Finally, please look to innovative implementation mechanisms such as density transfers and comprehensive agreements with landowners.¹

Please take the long view and make sure that nature is able to survive climate change and the other challenges it faces. Expanded SEAs are our best and only hope.

Yours truly,

A rectangular box containing a handwritten signature in blue ink that reads 'Dan Silver'.

Dan Silver
Executive Director

¹ In the special case of the Tejon Ranch Land-Use and Conservation Agreement, where a landowner has committed to dedicate lands of high resource value for permanent conservation both within SEAs and adjacent to SEAs but not in them solely by virtue of jurisdictional boundaries, these circumstances should be considered positively when assessing whether SEA objectives are met.

Tue 7/29/2014 10:40 AM

Dear Ms. Howard.

As a resident near the communities of Forrest Park and Mint Canyon, I want to contribute comment on the SEA Program Hearing regarding the Cruzan Mesa Vernal Pools SEA and the surrounding area.

Members of the communities surrounding Cruzan Mesa Vernal Pools SEA and Cruzan Mesa Road have enjoyed the open space for outdoor activities, such as walking, riding horses or bicycles, enjoying the beauty of nature. This area is home to a wealth of wildlife including deer, bobcat, coyote, and quail and a diverse growth of native plants which feed and protect the wildlife. One of our neighbors even delivers water to the area for the wildlife during the dry months.

It's a beautiful area, with spectacular views, which I encourage you to visit so you may also experience the beauty of the area.

On behalf of the community members surrounding Cruzan Mesa Vernal Pools SEA and Cruzan Mesa Road, we ask that you continue to maintain, or if possible, enlarge the borders around the Cruzan Mesa Vernal Pools SEA, and protect the area from development.

Thank you for your consideration of my comments. We sincerely appreciate your diligence in seeking a positive outcome in this program.

Best regards,

Denise Jens

From: Christopher A Reed
Sent: Wednesday, July 30, 2014 6:04 PM
To: Emma Howard
Subject: Item 6d, August 6, 2014: Significant Ecological Areas Program—SUPPORT

Esther L. Valadez, Chair
Regional Planning Commission
300 West Temple St., 13th Floor
Los Angeles, CA 90012

RE: Item 6d, August 6, 2014: Significant Ecological Areas Program—SUPPORT

Dear Chairperson Valadez and Members of the Commission:

I urge you to protect the beautiful and irreplaceable natural heritage of Los Angeles County through *expanded* Significant Ecological Area (SEA) boundaries. The SEAs are the only home left for our remaining wildlife and provide beauty and enjoyment for people. The expanded SEAs have been developed through a sound scientific process, and are needed to balance the major growth called for in the new General Plan. Besides expansion, in order to make SEAs stronger, *connectivity* should be added as a defining factor. Major portions of land must be preserved.

We also need a revised SEA Ordinance that is both efficient for applicants and effective for resource protection. Finally, please look to innovative implementation mechanisms such as density transfers and comprehensive agreements with landowners.

For the sake of future generations, be sure to take the long view and make sure that nature is able to survive climate change and the other challenges it faces. Expanded SEAs are essential, our best and only hope.

Thank you.
Sincerely,
Chris Reed
Distinguished Professor of Chemistry
University of California, Riverside

From: Charlotte Pirch
Sent: Wednesday, July 30, 2014 5:16 PM
To: Rosie Ruiz; Emma Howard
Subject: Significant Ecological Areas (Item 6d, Aug. 6, 2014) – SUPPORT

Esther L. Valadez, Chair
Regional Planning Commission
300 West Temple St., 13th Floor
Los Angeles, CA 90012

RE: Item 6d, August 6, 2014: Significant Ecological Areas Program—*SUPPORT*

Dear Chairperson Valadez and Members of the Commission:

I ask you to protect the irreplaceable natural heritage of Los Angeles County through *expanded* Significant Ecological Area (SEA) boundaries. The SEAs are the only home left for our remaining wildlife and provide beauty and enjoyment for people. The expanded SEAs have been developed through a sound scientific process, and are needed to balance the major growth called for in the new General Plan. Besides expansion, in order to make SEAs stronger, connectivity should be added as a defining factor.

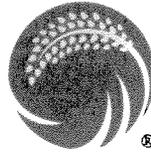
We also need a revised SEA Ordinance that is both efficient for applicants and effective for resource protection. Finally, please look to innovative implementation mechanisms such as density transfers and comprehensive agreements with landowners.

Please take the long view and make sure that nature is able to survive climate change and the other challenges it faces. Expanded SEAs are our best and only hope. Thank you.

Sincerely,

Charlotte Pirch

Fountain Valley, CA 92708



PALMDALE

a place to call home

July 23, 2014

JAMES C. LEDFORD, JR.
Mayor

TOM LACKEY
Mayor Pro Tem

MIKE DISPENZA
Councilmember

STEVEN D. HOFBAUER
Councilmember

FREDERICK THOMPSON
Councilmember

38300 Sierra Highway

Palmdale, CA 93550-4798

Tel: 661/267-5100

Fax: 661/267-5122

TDD: 661/267-5167

Auxiliary aids provided for

communication accessibility

upon 72 hours notice and request.

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

RE: Proposed Revision of the Significant Ecological Areas Ordinance (SEA)

Dear Ms. Howard:

Thank you for providing the City of Palmdale with the opportunity to comment on the above-mentioned proposed revision to the Significant Ecological Areas Ordinance within the Los Angeles County. The City of Palmdale provides the following comment on the proposed revision of the Ordinance:

The City appreciates the attention placed on the Significant Ecological Areas within the Antelope Valley. Protecting our environment is one of the City's priorities. However, the City of Palmdale must balance this with concerns over potential impacts to existing and future aggregate operations not only within City limits but within the unincorporated areas of Los Angeles County. Local mineral resources are of significant value to any community. Aggregate material, such as gravel and sand, are essential to the construction industry, the future development of our State, and it is a vital commodity to improve our roadway infrastructure. Time and time again, even at the national level, we hear that our roads and bridges need to be upgraded. The material to improve our local infrastructure should come from our local communities; after all aggregate material industries provide: reduced construction cost, a reduction in road pavement deterioration, reduced greenhouse gas emissions over imported aggregate, and local jobs, a very important component of a healthy community.

Letter to Ms. Howard
Significant Ecological Areas Ordinance (SEA)
July 23, 2014
Page 2

Existing environmental clearances, in cooperation with other agencies, such as Fish and Wildlife, have been successful in protecting not only SEA's but other areas at risk of environmental impacts associated with any project, including extraction of aggregate materials. With the continued shared efforts between local State and federal agencies, SEA's can continue to thrive without putting at risk the development of local jurisdictions and the existing working relationship between local governments and aggregate industries. The City of Palmdale recommends that consideration be given to existing and future extraction of aggregate material within SEA's due to the local, State and national importance.

Once again, the City of Palmdale appreciates the opportunity to comment on the proposed revision of the SEA Ordinance and looks forward to working with the Los Angeles County Regional Planning in addressing the future of aggregate material. Should you have any questions please contact Juan Carrillo or me at (661) 267-5200.

Sincerely,



Susan Koleda, AICP
Acting Planning Manager

SK:jc



CITY *of* CALABASAS

July 29, 2014

Ms. Connie Chung, AICP
Department of Regional Planning
County of Los Angeles
320 West Temple Street, Room 1356
Los Angeles, CA 90012

Re: Los Angeles County General Plan -- Public Review Draft

Dear Ms. Chung:

The draft General Plan Update for Los Angeles County includes an aggressive enlargement of the County's Significant Ecological Areas program. Fundamental to this is a new set of SEA maps which portray far more expansive SEA territories, to include a greatly expanded Santa Monica Mountains SEA. This aspect of the draft new plan needs to be more carefully explored, and the proposed Santa Monica Mountains SEA in particular should be more carefully mapped to not include properties which clearly fail to contribute to the SEA.

According to the Los Angeles County General Plan, Public Review Draft (page 127), a Significant Ecological Area (SEA) designation is:

"...given to land that contains irreplaceable biological resources, as detailed in Appendix E. Cumulatively, the 21 SEAs and nine Coastal Resource Areas (CRAs) represent the wide-ranging biodiversity of Los Angeles County, and contain its most important biological resources. Each individual SEA is sized to support sustainable populations of its component species, and includes undisturbed or lightly disturbed habitat along with linkages and corridors that promote species movement."

The General Plan clearly states (per above) that an "SEA designation is given to land that contains irreplaceable biological resources,... and contain its most important biological resources". Furthermore, it is stated that an SEA designation is given to land that "includes undisturbed or lightly disturbed habitat." However, the proposed SEA map for the Santa Monica Mountains area clearly includes fully developed and disturbed properties, including well-established commercial properties. For example, a five acre site located at 27349 Agoura Road is included as part of the proposed SEA, yet the property is fully developed with an 81,000 square-foot office building and parking

lot, and has been so developed for more than 12 years. Two other similarly developed office buildings sit within the same corridor in close proximity; all together the three buildings total more than 130,000 s.f. on roughly eight acres of completely developed and disturbed land. No natural habitat whatsoever (nor attendant biological resources) exists on these commercial properties. More importantly, the properties fail to satisfy any of the six criteria listed within the General Plan for SEA determination:

- A. The properties and/or corridor offer no natural or undisturbed habitat for core populations of endangered or threatened plant or animal species because it is a fully developed suburban office corridor with streets, streetlights, parking lots, and office buildings. The landscaping for the properties is entirely manicured and unnatural, characterized by automated irrigation systems, landscape lighting, non-native plant materials, and hardscapes.
- B. The properties and/or corridor offer no biotic resources that are uncommon on a regional basis because it is a fully developed suburban office corridor with streets, streetlights, parking lots, and office buildings. The landscaping for the properties is entirely manicured and unnatural, characterized by automated irrigation systems, landscape lighting, non-native plant materials, and hardscapes.
- C. The properties and/or corridor offer no biotic resources that are uncommon within the political boundaries of Los Angeles County, regardless of their availability elsewhere.
- D. The properties and/or corridor offer no habitat that at some point in the life cycle of a species or group of species, serves as concentrated breeding, feeding, resting, migrating grounds; nor do the properties/corridor possess resources that are essential to the maintenance of specific wildlife species. As previously noted, the area is a fully developed suburban office corridor with streets, streetlights, parking lots, and office buildings. The landscaping for the properties is entirely manicured and unnatural, characterized by automated irrigation systems, landscape lighting, non-native plant materials, and hardscapes. It is generally well known that wildlife movement occurs in the general area due to proximity of large open space lands and other protected lands to both the north and south, and the proximate 101 Freeway grade separation which accommodates wildlife movement between these open space areas. But the developed commercial sites, which happen to be located in close proximity to the freeway undercrossing, do not themselves contribute to, support, or enhance the wildlife migration phenomenon; and they clearly do not offer essential resources for wildlife movement, and therefore fail to meet this criterion.
- E. The property and/or corridor offers no biotic resources that are of scientific interest because they are either an extreme in physical/geographical limitations, or represent unusual variation in a biotic population or community. As previously noted, the area is a fully developed suburban office corridor with streets, streetlights, parking lots, and office buildings. The landscaping for the properties

is entirely manicured and unnatural, characterized by automated irrigation systems, landscape lighting, non-native plant materials, and hardscapes. In short, no unusual variations in plant or animal life warranting scientific study exist on these properties.

- F. Finally, and for the same reasons noted previously, the property and/or corridor offers no biotic resources that would provide for the preservation of relatively undisturbed examples of the original natural biotic communities in the County.

Significantly developed properties clearly should not be mapped as being part of the Santa Monica Mountains SEA, and should not be subject to SEA policies and regulations when they fail to meet any one of the six specified SEA selection criteria. The County planning department seemed to understand this when they excluded many other developed and partially developed areas from the SEA delineations. For example, within the portion of the General Plan which fully describes each of the SEAs, the narrative description of the Santa Monica Mountains SEA includes the following statement: "Within the SEA boundary, there are a number of areas that are not a part of the SEA due to dense development." Accordingly, the narrative points out by way of example that La Sierra, Malibu Lake, and most of the City of Malibu were all excluded. The following language is also contained within this section: "A small island of developed area south of State Route-101 and along Liberty Canyon is excluded from the SEA." This described area of residential development is situated immediately adjacent to the commercial corridor area I discussed earlier. Looking at the SEA map, one might conclude that the residential subdivisions and condominium properties were excluded for density reasons (they total more than 630 units, by the way, with an average density of 2.9 units per acre). But why not also exclude the three existing commercial office buildings located in the same area which collectively total more than 130,000 square feet? The commercial properties are easily more densely developed than the residential subdivisions to the south, and they are certainly not any less urban.

Meanwhile, it is equally troubling to see that only one portion of Malibu Lake was excluded (because, as stated in the narrative, it was "densely developed"); while the other portion of Malibu Lake, which is just as intensely developed, was not excluded. Also, residential developments on ridgelines north of Malibu were excluded, and a portion of the Cornell/Kanan corridor was excluded, while other equally densely developed portions were not excluded. Finally, both Westlake Village and Agoura Hills were almost entirely excluded, with no stream corridors located in either of those communities having been included. For example, Media Creek in Agoura Hills was excluded entirely, while Las Virgenes Creek in Calabasas was included in its entirety in spite of its highly channelized condition that is not altogether different than the condition of Media Creek and other streams in the area. These incongruences are genuinely baffling, suggesting an arbitrary mapping process was employed. All of these observations bring to question whether any rational bases were applied to make these SEA delineations on the proposed SEA maps.

A supplemental SEA map, prepared by the County planning staff, portrays developed properties through the use of red-colored shading. However, it is unclear what purpose the supplemental map actually serves. Fully developed properties do not offer meaningful habitat value and, accordingly, do not contribute to any SEA to the same extent as undeveloped properties. Meanwhile, there appears to be no variation in applicable SEA rules and regulations based upon this supplemental map; thus, it seems that the mapped developed properties are being arbitrarily included in the County's new SEA delineations and made to abide by certain SEA-specific policies and regulations in spite of an obvious lack of a rational nexus. Where such developed properties are clustered together to form a highly modified and inhabited area (characterized by paved roadways, parking lots, buildings, nighttime lighting, and attendant human activity), it would be much more appropriate to, simply exclude these areas from the SEA delineations altogether. Meanwhile, isolated and scattered homes and other structures could continue to be depicted on the supplemental map to help guide decision-makers and staff in the consideration of future projects based upon application of a reasonable set of modified SEA standards and guidelines, as would be appropriate for existing development.

Suggestions and Recommendations

First, we strongly recommend that the delineated SEA areas be tightened up to include only those developed or partially developed properties which truly contribute to habitat resources and serve to enhance and strengthen the SEA, consistent with the purpose, intent, and definition of an SEA. Moreover, properties which clearly fail to meet any of the six selection criteria should be unilaterally excluded from any delineated SEA. Accordingly, the existing fully developed commercial properties on West Agoura Road should be excluded from the Santa Monica Mountains SEA. Secondly, overall mapping consistency should be improved such that significantly altered stream channels within urban areas should be consistently included or excluded, rather than arbitrary selection of some urban streams over others without well-reasoned and documented bases for the distinctions.

Thank you again for the opportunity to comment on the draft General Plan Update for Los Angeles County. Please contact Tom Bartlett at 818-224-1703 with any questions you may have.

Sincerely,



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Community Development Director

Cc: Tom Bartlett, AICP, City Planner