



March 29, 2013

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

SUBJECT: Significant Ecological Area Ordinance – December 2012 Draft

Dear Ms. Howard,

The Valley Industry & Commerce Association (VICA) is concerned about certain aspects of the SEA draft ordinance released in December 2012, particularly duplicative review and the substantial expansion of designated areas.

We are very concerned that the SEA Technical Advisory Council will place an undue burden on businesses, who must already comply these multiple policies and regulations that govern the same critical species and habitats.

As you know, planning projects already undergo several levels of environmental review. The California Department of Fish & Wildlife, U.S. Fish & Wildlife Service, Army Corps of Engineers, and the Los Angeles County Forest Service already have jurisdiction to review projects. Projects are also subject to the California Environmental Quality Act and the Endangered Species Act, which allow for scrutiny by local governing bodies and require public hearing processes for residents and environmental organizations to express their concerns. These existing levels of review are already redundant or duplicative, due to a lack of coordination and oversight.

Furthermore, we are concerned about the drastic expansion of designated SEAs.

We understand that the theory behind expanding the designated areas by 520,000 acres is to connect the current 125,787 acres of SEAs, in an effort to protect against any possible negative impact if and when species migrate.

However, we are alarmed by the lack of quantitative data to support designation of these 645,517 acres and their respective parcels. We understand that the new designations are based primarily on limited information available about flood zones, hillsides, seismic zones, liquefaction and other geographic features of the county. Expansion may be necessary, but determining the areas based on minimal data about related, but distinctly different, physical characteristics is insufficient justification.

In the next draft EIR, we look forward to clarification of the criteria used to create the proposed SEA boundaries, including what biology has changed since 1980 to warrant the expansion of the SEA boundaries. We would also like detailed information about the studies conducted for each newly-designed parcel and what aspects of those studies were used to justify their inclusion in a SEA.

As currently drafted, the positive intent simply does not outweigh the negative consequences on economic development. VICA cannot support an initiative that needlessly increases the cost of development and creates time delays for critical infrastructure and housing.

We look forward to development of a more appropriate, reasonable approach toward facilitating a balance between development and resource conservation.

Sincerely,

A handwritten signature in black ink, appearing to read 'D Adelman', with a long horizontal flourish extending to the right.

David Adelman
Chair

A handwritten signature in black ink, appearing to read 'Stuart Waldman', written in a cursive style.

Stuart Waldman
President