

# ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



February 19, 2019

*VIA ELECTRONIC MAIL*

Elvin W. Moon, Chair  
Los Angeles County Regional Planning Commission  
320 W. Temple Street, 13<sup>th</sup> Floor  
Los Angeles, CA 90012

Environmental Planning & Sustainability Section  
Los Angeles County Department of Regional Planning  
320 W. Temple Street, Room 1354  
Los Angeles, CA 90012

**RE: Item 7; Project No. 2017-003723 – Significant Ecological Areas (SEA)  
Program Update General Plan Amendment No. RPPL2018003985 – SEA  
Program Update – Conceptual SEAs Advance Planning No. RPPL2017006228 –  
SEA Program Update – SEA Ordinance Environmental Assessment No.  
RRPL201800447; Hearing Date, February 27, 2019 — *SUPPORT***

Dear Chairperson Moon and Members of the Commission:

Endangered Habitats League (EHL) and the undersigned organizations *support* the adoption of this Ordinance, as revised on January 28, 2019, and associated General Plan Amendment. EHL is a Southern California regional conservation group which has been actively engaged in the SEA process. *This letter is also sent on behalf of Palos Verdes/South Bay Audubon Society, Los Angeles Audubon Society, Audubon California, Hills for Everyone, Natural Resources Defense Council, Transition Habitat Conservancy, The Urban Wildlands Group, and The Nature Conservancy.*

Years of thoughtful effort and stakeholder outreach have yielded a sound and important accomplishment. The conversion of “Conceptual SEAs” to official SEAs is a vital improvement that has been retained in the current version. We are, however, disappointed that this iteration does not remove the wholly unscientific and unjustified exemptions for single family homes and previously disturbed farmland in the Antelope Valley. *We therefore ask you to include in your motion a recommendation to remove these exemptions as soon as possible.*

The essence of what this Ordinance accomplishes is the successful combination of project streamlining with the principles of conservation biology. Indeed, a ministerial process can supersede the need for SEA Conditional Use Permits, which, with their many ambiguities, were the mainstay of the old ordinance. Simplified compliance with the Development Standards now serves as a positive incentive for applicants.

Construction of single-family homes on legal lots and new subdivisions of land will all benefit. Clear, up-front, and biologically based requirements for amount and configuration of natural open space, as well as standardized mitigation ratios, will ensure that the goal of the ordinance—protection of precious SEA resources during development—will actually be met. As noted by the U.S. Fish and Wildlife Service, these development standards will also simplify any necessary federal permitting.

Staff has wisely put in place a consultative process for the *early* identification of biological constraints, so that applicants' time and money is not wasted. And an illustrated Implementation Guide provides detailed guidance for compliance.

Finally, we note that prior Commission direction to bring site design considerations into the findings for SEA Conditional Use Permits has resulted in additional improvements to that process.

Over the years, numerous changes have led to an Ordinance that gets the “big picture” of resource protection right and also includes many important details, from night lighting to non-reflective glass which will save the lives of birds. While we could suggest additional improvements, a threshold has been crossed, and the time has come to adopt and move forward, accompanied by the recommendation to expeditiously remove the Antelope Valley exemptions.

Thank you for considering our views.

Yours truly,



Dan Silver  
Executive Director

Jess Morton  
*Treasurer*  
Palos Verdes/South Bay Audubon Society

Claire Schlotterbeck  
*Executive Director*  
Hills for Everyone

Damon Nagami  
*Senior Attorney*  
Natural Resources Defense Council

Catherine Rich  
*Executive Officer*  
The Urban Wildlands Group

Travis Longcore  
*Conservation Chair*  
Los Angeles Audubon Society

Jill Bays  
*President*  
Transition Habitat Conservancy

Shona Ganguly  
*Assoc. Director, Advocacy & Campaigns*  
The Nature Conservancy

Garry George  
*Renewable Energy Director*  
Audubon California



# Puente Hills Habitat Preservation Authority

Endowment Provided by the Puente Hills Landfill

February 19, 2019

David W. Louie, Chair  
Los Angeles County Regional Planning Commission

c/o Los Angeles County Department of Regional Planning  
Environmental Planning & Sustainability Section  
Attn: Iris Chi, AICP, Planner  
320 W. Temple Street, 13<sup>th</sup> Floor  
Los Angeles, CA 90012  
[sea@planning.lacounty.gov](mailto:sea@planning.lacounty.gov)

## **Regarding: Comments on Significant Ecological Area Ordinance**

Dear Chair Louie and Members of the Commission:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the final draft of the Significant Ecological Area (SEA) Ordinance.

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 area of the Puente Hills known as Hacienda Heights.

Overall, the Habitat Authority recognizes the need for an updated SEA Ordinance to protect sensitive ecological areas of the County of Los Angeles. We are supportive in concept of this final draft including making conceptual SEAs permanent with adoption of the ordinance, but have remaining reservations.

**Exempt Government Open Space Land Managers from the Ordinance** - Organizations and especially public land management agencies that do not collect public tax dollars and whose main mission are in alignment with the goals of the Ordinance, such as the Habitat Authority, should be considered exempt from the Ordinance including its fee structure. Government organizations are held accountable to a higher standard of transparency and due diligence in their process and conduct. This extra layer of regulating for planning and routine management is significant for a small agency



such as ours. Additionally, if this ordinance is to apply to local government agencies, we recommend that it also apply to all county departments.

Thank you for your consideration of our comments. Feel free to contact me or Andrea Gullo, Executive Director, at (562) 945-9003 or [agullo@habitatauthority.org](mailto:agullo@habitatauthority.org) for further discussion. Also, please maintain our agency on the contact list for this planning process regarding the SEA Ordinance.

Sincerely,

A handwritten signature in black ink that reads "Bob Henderson". The signature is written in a cursive, flowing style.

Bob Henderson  
Chairman

cc: Board of Directors  
Citizens Technical Advisory Committee