

Section in Public REVIEW Draft Ordinance	Comment	Commenter	Revisions made in the Public HEARING Draft. In this column, "Ordinance" refers to the SEA Ordinance (Public Hearing Draft). "Guide" refers to the SEA Implementation Guide (Public Hearing Draft).
<b>Section 1 in Public REVIEW Draft (March 2018)</b>			
<b>Division 2</b>	Definitions should use the same wording as in Purpose (22.102.010), including wildlife corridor, connectivity, feed, cover and nesting habitat.	Antelope Acres TC	No action. Comment is unclear and more clarification is needed.
<b>22.102.010 (Purpose) in Public REVIEW Draft (March 2018)</b>			
	<p>The definition is unclear. What does connectivity to regional natural resources mean? How does providing additional technical review reduce effects of habitat fragmentation in order to protect the biodiversity and unique resources of SEAs? How can development sustain connectivity and conserve biological diversity and habitat quality at the same time?</p> <p>Directing development be designed in a manner which considers impacts to SEA resources is a very vague statement. Impacts noticed or taken into account gives a variety of choices to developers to use a SEA by preservation of other land not within the same location.</p> <p>SEAs are already fragmented, developed, about to be redeveloped, rezoned or destroyed by roads, solar facilities or man made amenities to support human population. (Example: contiguous or corner touching property lines that create donut hole divisions as in annexed city boundaries.)</p>	Antelope Acres TC	No action. Connectivity to regional natural resources means connecting SEAs to preserved open spaces like National Forest, preserves, water resources, etc. Technical review allows staff to guide development in the least impactful location and require sensitive design guidelines. By doing this technical review prior to project application, development has a chance to conserve connectivity and biodiversity when built.
<b>A</b>	We suggest that the description of unique resources on page 3 include "unique geological formations". While this was part of the original SEA definition and it is clearly mentioned later in the ordinance, we believe it would be beneficial to also list it in this section.	SCOPE	"unique geological formations" added to Ordinance. "Geological features" was also added to the glossary of the Guide.
<b>B</b>	We suggest the language in CAPS be added: B. Ensuring that projects reduce the effects of habitat fragmentation AND EDGE EFFECTS by providing additional technical review of existing resources, potential impacts and required mitigations.	Hills For Everyone	"Edge effects" was added to the Ordinance in purpose and definition sections. "Edge effects" was also added to the glossary of the Guide.
<b>D</b>	By considering impacts to development to be designed makes the purpose of SEAs insignificant. This is a vague, broad statement that only gives notice to impacts. Impacts should be eliminated.	Antelope Acres TC	Added "and avoids" to the sentence in this section. "And avoids" was also added to Chapter 5 of the Guide, under "Purpose of SEA Ordinance" (page 61).
<b>D</b>	delete "considers", add "avoids" Justification – the best way for the County to protect the Sensitive Ecological Areas is to avoid impacts to them during development design.	CNPS & CBD	Kept "considers" but added "and avoids" to the sentence in this section. "And avoids" was also added to Chapter 5 of the Guide, under "Purpose of SEA Ordinance" (page 61).
<b>22.102.020 (Definitions) in Public REVIEW Draft (March 2018)</b>			
<b>B</b>	This draft definition requires that developments in an SEA would have to work with a biologist on the SEATAC Certified Biologist List. Applicants should not be limited to the SEATAC list. Many of the biologists our members work with are well qualified and are familiar with the specific development that, often times, they have been working on over several years. If this suggestion were to be adopted we would request that references to the "SEATAC Certified Biologist List" be taken out from the entirety of the ordinance.	BIA	No action. All biologists are welcome to apply to be on the SEATAC certified list. Process is available on our website. <a href="http://planning.lacounty.gov/agenda/seatac">http://planning.lacounty.gov/agenda/seatac</a>
<b>D</b>	If it is "proposed" what is the meaning of the wording "is developed"? A limit of 20,000 sq. ft. building site should include NO exemptions.	Antelope Acres TC	No action. "Is developed" can mean an established development seeking to make additions. The exemptions for the 20,000 sq. ft building site area are required infrastructure and improvements associated with development. It allows projects to possibly receive a ministerial review while meeting infrastructure requirements.

D	Recommends adding a condition to issue a permit to construct driveways only when concurrent with the construction of the associated residence or other primary structure.	NPS	Added "associated with the primary use" to clarify when the exclusions are acceptable. The definition for Building Site Area (BSA) was moved as a subsection of Definition K (Development footprint) in the Ordinance to show that the 2 terms are related. In the Guide, BSA was moved to Chapter 2 and a graphic (page 14) was included to show the comparison between Development Footprint and BSA.
D.1	Excluded developments total up significantly. Why is it excluded in the site area? Please give a reason if this is for a specific master planned community.	Antelope Acres TC	No action. The exemptions for the 20,000 sq. ft building site area are required infrastructure and improvements associated with development. It allows projects to possibly receive a ministerial review while meeting infrastructure requirements. Impacts caused by excluded infrastructures will be evaluated and must comply with development standards.
D.3	Requirements for LA Co Fire Department should be included and totaled to all grading.	Antelope Acres TC	No action. The exemptions for the 20,000 sq. ft building site area are required infrastructure and improvements associated with development. It allows projects to possibly receive a ministerial review while meeting infrastructure requirements. Impacts caused by excluded infrastructures will be evaluated and must comply with development standards.
D.3	Change "Turnaround" to "turn-around"	Caltrans	Changed to "turn-around" in the Ordinance and Guide.
D.4	Remove this line. Justification – The fuel modification zone should not be excluded from the total building site area. Fuel modification can be a big impact on the local resources, particularly for small projects. Fuel modification may involve the clearance of native plants from 100 to 300 feet around every structure on the site. The yearly clearance of vegetation effectively eliminates all annual and perennial native herbaceous plants. Also, pruning in successive years, of native shrubs and small trees often results in the death of those plants. What remains on sites where fuel modification has occurred are non-native plants, particularly weedy grasses. Additionally, these areas suffer from higher rates of soil erosion, as the matrix of native shrubs and trees that typically hold slopes in place is no longer intact. Fuel modification zones need to be included in the development footprint. Indeed, the same section, J. 1, defines Development as “Alteration to existing vegetation, including but not limited to vegetation removal for fuel modification,...” (at pg. 5 emphasis added), and in K. ““Development footprint” means the area of disturbance for development, including but not limited to, all structures, driveways and access, fuel modification areas...” (at pg. 6 emphasis added). We support inclusion of the “fuel modification” in the development footprint.	CNPS & CBD	No action. Fuel mod zone is included in the definition of development footprint. Fuel Mod Zones are excluded from building site area as it is required hazard mitigation associated with development. It allows projects to possibly receive a ministerial review while meeting infrastructure requirements. Impacts caused by excluded infrastructures will be evaluated and must comply with development standards.
E	Please add in perpetuity to the statement “restrictions to permanently limit”.	Antelope Acres TC	No action since "permanently" and "in perpetuity" are interchangeable terms.
F	The number of “habitat or species credit” is similar to “carbon credits”, The numbers here are for living creatures and their habitat that sustain all of us. Mitigation must remain in the same area, not credited to another geographical location.	Antelope Acres TC	Adding clarifying language to 22.102.100.D.2 in the Ordinance to say mitigation shall be within or contiguous with same SEA.
F	Use "project developers" or "developers", such that it is consistent with section G.	Caltrans	Change to "project developers" in the Ordinance and in Chapter 8 of the Guide.

F & G	<p>“Conservation or Mitigation Bank” and “Conservation in lieu fee” need to be defined more precisely. Mitigation banking and in lieu fee options should be expanded to be a programmatic component of SEA implementation and management. This program should include ongoing tracking, reporting, and enforcement components. Without these, offsite mitigation has a high likelihood of failure and is therefore a threat to the very resources it is intended to protect.</p> <p>Ratios of replacement vegetation should be commensurate with those recommended by resource management agencies, especially California Department of Fish and Wildlife. Special plants and habitat types should minimally have a 4:1 ratio, with old growth habitats including chaparral compensated at a ratio of 10:1. More common species within an SEA should minimally be mitigated at a 2:1 ratio.</p> <p>Banking, mitigation, deed restrictions, and in lieu fee projects should regularly be reported at the regional level using GIS mapping. These should include the annual publication of a .kmz (or similar easily viewable file format) showing the properties covered, photo-documentation of management actions, and survey results. This tracking should be incorporated into SEA programmatic planning and mapping components, and should be administered by dedicated County Regional Planning staff whose primary responsibilities is to insure that all agreements are upheld and executed as required.</p> <p>Any and all mitigation must require like-for-like components for compensation. Soils, slope, topography, aspect, range, growing conditions, and habitat type must all match between development and mitigation sites. All must be within the same watershed and SEA.</p>	CNPS & CBD	<p>Added clarifying language to 22.102.100.D.2 in the Ordinance and Guide (page 78) to ensure that all off-site preservation occurs within or contiguous with same SEA as the development.</p> <p>Guidance for off-site preservation, including conservation and mitigation banks and in-lieu fees, is provided in chapter 8 of the Guide. Any off-site preservation is only allowed through a discretionary review process (SEA CUP), through which proposed mitigation will be reviewed by the Staff Biologist to ensure that it is appropriate and adequate.</p> <p>Development impacting state or federally protected resources are subject to both requirements of the management agencies and the County. The applicant will be required to meet whichever ratio is most protective of the resource.</p> <p>We are working on setting up a tracking and reporting system for preserved open space in SEAs (and County-wide). This will be part of the monitoring component of the SEA program.</p>
G	These fees must be used for mitigation in the same area.	Antelope Acres TC	Added clarifying language to 22.102.100.D.2 in the Ordinance and Guide (page 78) to ensure that all off-site preservation occurs within or contiguous with same SEA as the development.
J	<p>For clarity, we would like the inclusion of language that points out that the “following activities” under the SEA “Development” definition excludes exempted developments under Section 22.102.040 of the ordinance. This would eliminate any confusion related to what is exempted and not subject to this section or definition. Accordingly, BIA requests that §22.102.20 (J) be revised to read (requested change underlined):</p> <p>J. “Development” means any of the following activities within an SEA, unless otherwise exempt under Section 22.102.040</p>	BIA	No action. Exemptions may still be considered development but will not be subject to the SEA ordinance.
J	Please add the following words (from Roget’s Thesaurus). Development is outgrowth, consequence, change and expansion. The word alteration is a simplified explanation of a permanent modification.	Antelope Acres TC	No action since the words have similar definitions.
J	<p>This Section describes several activities considered as development and states. “Development” means any of the following activities within an SEA”</p> <p>CDFW recommends that groundwater extraction be considered a type of development for the purposes of the Ordinance. Changes in groundwater can effect surface water and soil moisture availability and associated wildlife and botanical resources that depend on these resources.</p>	CDFW	No action. Any new groundwater extraction requiring vegetation disturbance or grading will be considered development. Under discretionary SEA CUP, biologists can evaluate any apparent biological impacts from groundwater extraction.
J.4	should also include cell towers. It is thought that electromagnetic fields from cell towers may affect birds. Their construction during nesting season, particularly in an SEA, should not be allowed.	SCOPE	No action. Cell towers are covered by I.5 (Development). Construction during nesting season will require nesting bird survey and avoidance of nests if found.
J.4	<p>SCE also requests that Section 22.102.020(J)(4) (Definition of Development) be modified for clarity to exclude electrical power transmission and distribution lines owned or operated by publicly regulated utilities.</p> <p>4. Construction, placement, modification, expansion, or demolition of any infrastructure, including but not limited to, water and sewerage lines, drainage facilities, telephone lines, and electrical power transmission and distribution lines (<b>excluding publicly regulated utilities</b>), including all associated construction staging;</p>	SoCal Edison	No action or changes to language. PCN certificate, order, rule will supersede County zoning code. Any activity under a PCN certificate, order, rule is already exempt from this ordinance.
J.4 & J.5	Specify difference between "structure" and "infrastructure" or perhaps combine section 4 & 5	Caltrans	No action. Section 22.102.020.I.4 in the Ordinance provides examples of infrastructure.
J.6	<p>This Section defines fencing as “areas used for livestock or companion animals including riding rings, kennels, paddocks, and grazing lands;”</p> <p>CDFW recommends that the definition of fencing include areas fenced for security reasons include but not be limited to: airports; prisons; large estates; agricultural croplands; resorts; mines; reservoirs; aqua ducts; public recreation facilities; etc.</p>	CDFW	Added "or for security purposes" to I.6 in the Ordinance.

<b>J.7</b>	County describes "Land Divisions" as a development activity. This should also be excluded from the definition of development since land division in and of itself is not development.	BIA	No action. Land divisions is considered development activity since the developer has a choice on how to draw the lot lines. The divided lots can be developed with least impact to biological resources by requiring a Ministerial SEA Review. For additional information, refer to the development standard on Large Lot Parcel Map in Section 22.102.090.D.3.a.
<b>K</b>	Is this the permittable 20,000 square feet of a single building? What is the maximum amount of disturbance allowed that does not count into the development footprint? Would this be considered as "barefootprint"?	Antelope Acres TC	No action. 20,000 sq. ft is not the development footprint but the building site area. For all disturbance is part of dev footprint but there are exclusions that will not count as part of the 20,000 sq. ft building site area calculated to see if the development is able to receive a Ministerial SEA Review.  The definition for Building Site Area (BSA) was moved as a subsection of Definition K (Development footprint) in the Ordinance to show that the 2 terms are related. In the Guide, BSA was moved to Chapter 2 and a graphic (page 14) was included to show the comparison between Development Footprint and BSA.
<b>K</b>	Note that this definition also conflicts with Definition D. Please note 22.102.080 SEA Development Standards that separate SEAs into categories of allowable disturbance and the prescribed mitigations for each type of disturbance.		The definition for Building Site Area (BSA) was moved as a subsection of Definition K (Development footprint) in the Public Hearing Draft to show that the 2 terms are related. In the Guide, BSA was moved to Chapter 2 and a graphic (page 14) was included to show the comparison between Development Footprint and BSA.
<b>K</b>	we suggest that the definition of Development Footprint should include temporary impact areas, such as exploratory testing, as well as the disturbed areas already listed.	CNPS SG Mountains	Added "both permanent and temporary" to definition of Development Footprint.
<b>N</b>	Place comma between "fertile soil" and "scenic views"	Caltrans	Added comma
<b>P</b>	Woodland must include a culmination of all seven types of features.	Antelope Acres TC	Remove Formation types from Definitions since it is no longer referred in the Ordinance. Created a new definition for Geological Features (Definition S) in the Ordinance that includes beaches, dunes, rock outcrops, and rocklands. Created standalone definitions for Stream (Definition FF) and Wetland (Definition JJ).
<b>P.3</b>	While we recognize that native grasslands can be a component of the formation defined as herbland, because native grasslands are a rare plant community. Los Angeles County still has some of the best and largest native grasslands remaining in California. Therefore it is prudent to identify a unique category for Native Grasslands.	CNPS & CBD	Added a new definition for Native Grassland in the Guide.
<b>P.6 &amp; P.7</b>	While the 6. Addresses streams and 7. addresses Wetlands and references the Army Corps of Engineers Wetland Delineation Manual, these wetlands and waters issues are also subject to waters of the State, through the 401 Certification and Wetlands Program and the Lake and Streambed Alteration process. In order to accurately document the episodic streams on development sites we recommend that surveyors employ the Mapping Episodic Stream Activity (MESA) protocols developed by CDFW and the California Energy Commission. The SEA ordinance needs to reference and include California's implementation of the Clean Water Act and the Lake and Streambed Program	CNPS & CBD	Revised definitions per guidance from SEATAC and CDFW. Included a reference to MESA in the Guide Glossary for definition of Stream. Included clarifying language in the Guide in Chapter 4 (page37). All development projects are also subject to permitting requirements of state and federal agencies.

P.7	<p>This section describes “Formation Types” to define generalized structures of a stand of vegetation or physical feature. Wetland is defined as a Formation Type that is “An area of land that is inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances does support, a prevalence of vegetation typically adapted for life in saturated soil conditions, with determinations following guidelines defined in the Corps of Engineers Wetland Delineation Manual.”</p> <p>In order for the Ordinance to be more inclusive of biological resource protection in the predominately arid regions of the subject coverage area, <b>CDFW recommends that the Ordinance follow the wetland determinations guidelines defined in the United States Fish and Wildlife Service (USFW) Classification of Wetlands and Deepwater Habitats of the United States (Cowardin, 1979).</b> For purposes of this classification, a wetland must satisfy one or more of the following three wetland indicator parameters: (1) at least periodically, the land supports predominantly hydrophytes; (2) the substrate is predominantly undrained hydric soil; and (3) the substrate is nonsoil and is saturated with water or covered by shallow water at some time during the growing season of each year. Wetland determinations defined under the Corps of Engineers Wetland Delineation Manual must satisfy all three of the above wetland indicator parameters (vegetation, soils, and hydrology) to qualify as a wetland. The Corps of Engineers wetland delineation standard will potentially limit the recognition and protection of wetlands and associated biological resource value in the SEAs covered under the Ordinance.</p>	CDFW	Revised definition of "Wetland" in Ordinance and Guide (page 37 and Glossary).
Q	The definition must include the reference to habitat disturbance also, not only vegetative.	Antelope Acres TC	Changed "vegetation" to "natural habitat" in Ordinance and Guide. Definition of "Fragmentation" was added to the Guide Glossary.
R	<p>This section states that “habitat type” is generally referred to as vegetation type “as defined by standard references, such as Holland (1988) or Sawyer et al (2009).” CDFW asks that this be rewritten to “as defined by the state’s standard known as the Survey of California Vegetation (SCV), which is available on the California Department of Fish and Wildlife website.”</p> <p>CDFW no longer supports the use of the Holland classification. Instead, in 2007 the Legislature directed CDFW to develop a vegetation classification and mapping standard for California based on data-driven, defensible definitions of vegetation types. The standard presents membership rules for vegetation types so they are clearly defined and understood by all users. The Manual of California Vegetation, second edition, (Sawyer et al. 2009) presented the state of the standard classification in 2009. However, much more of California has been classified and analyzed, and updates will now be published on the CDFW website in the form of lists (<a href="https://www.wildlife.ca.gov/Data/VegCAMP">https://www.wildlife.ca.gov/Data/VegCAMP</a>) and CNPS website (as the Online Manual of California Vegetation). The vegetation types of Los Angeles are fairly well documented, at least at the Alliance level, and so biologists need not rely on outdated Holland types.</p>	CDFW	Removed "Habitat Type" definition from Ordinance since the SEA CUP mitigation ratios were restructured and is no longer determined by habitat and formation types.
T	Is this definition the same as “wildlife corridor” Does it mean the same thing?	Antelope Acres TC	No action. "Linkage" includes area of land that allows for plant species to move between areas. Linkage also includes narrower areas or pathways that wouldn't necessarily support movement for bigger species. "Wildlife Corridor" pertains to the movement of wildlife (Definition LL).
U	22.102.020 Definitions. U. “Natural Community” definition (at pg.8) needs to reference and align the State of California’s definitions of natural communities including Sensitive Natural Communities and the Natural Communities List.	CNPS & CBD	No action. This definition of "natural community" aligns with CDFW's definition and is the foundation for subsequent SEA Resource classifications.
U	This section defines “natural community” as a “.distinctive assemblage of plant species that live together and are linked by their effects on one another and their environment, and which present a characteristic appearance based on size, shape, and spacing that is reflective of the effects of local climate, soil, water, disturbance, and other environmental factors.” However, CDFW is unsure how this differs from “habitat types” in 22.102.020 (R). CDFW uses “vegetation types” and “natural communities” interchangeably, and since 22.102.020 (X) (1) et seq. refer to “natural communities” as ranked by CDFW, we recommend the Ordinance define “habitat type” and “natural communities” as the same thing; the definition in this section is very good.	CDFW	Removed the definition for "habitat type" since that term is no longer used in the Ordinance. The definition for "Natural Community" was kept in the Ordinance.

X	<p>Most oak woodland associations found in the County (e.g. "Coast Live Oak Woodland" (G5/S4), "Mixed Oak Forest" (G4/S4), "Canyon Live Oak Forest" (G5/S5) ) are given rankings of 4 or 5, which should render them a Resource Category Level 4. The more sensitive Engelmann, Island, etc. oak woodlands are G3/S3, which should be Resource Category Level 3. S2 is defined as "Imperiled in the state because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or state." S4 is defined as "Uncommon but not rare; some cause for long-term concern due to declines or other factors." The aforementioned rankings for oak woodland alliances comport with these definitions. Some other native trees are similarly given S4/G4 rankings (e.g. California juniper, California bay, etc.) or not given a ranking at all. The CDFW has gone to an awful lot of work to classify the Holland code associations/alliances that are de rigeur in biological reports throughout the state according to criteria to which you give deference. If you stick with a consistent framework established by the CDFW, the framework can live on indefinitely, even as the CDFW revises rankings as conditions change.</p> <p>Suggestion: Don't override the CDFW classifications. It makes for a very inconsistent application. If you think oak tree associations/alliances should have additional protections above and beyond the discretionary review that will be required, simply amend the requirements for Resource Category 3 and 4. Don't gerrymander.</p>	Stephen Maxwell (AV resident)	No action. The state ranks species and communities based on state-wide distribution. The County has the authority to also classify certain resources as more rare or sensitive within the county based on local distribution. The County has a history of treating oaks and oak woodlands as more sensitive locally than on a state level.
X	<p>The ordinance defines SEA resource categories 1 through 5 based on CDFW's ranking or by utilizing NatureServe's Conservation Status Assessment Methodology for unranked communities. CDFW is concerned that this allows the biologists to define communities on an ad hoc basis and then rank them. This should be worded to "SEA Resource Category 1' includes natural communities accepted by California Department of Fish and Wildlife (CDFW) and ranked G1 or S1 by CDFW or utilizing NatureServe's Conservation Status Assessment methodology for unranked communities" in 22.102.020 (R) X(1) and as appropriate for the other sections.</p> <p><b>CDFW recommends the text in the SEA Ordinance Implementation Guide be modified per the comments above: For example, bullet 3 on page 51 and bullet 2 on page 52 should refer to the CDFW Survey of California Vegetation and CNPS Online Manual of California Vegetation.</b></p>	CDFW	Revised the Ordinance and Guide to match CDFW recommendation for utilizing their ranking system. Changed reference to <i>A Manual of California Vegetation</i> to the <i>Online Manual of California Vegetation</i> since this is kept more current. Added footnote in Ch 6 (page 65) of the Guide regarding unnamed or unranked communities.
X.1	Must all existing animal and plant species need to be endangered before they are protected? Might that not be too late?	Antelope Acres TC	No action. We are trying to protect all sensitive species through the 4 SEA Resource Categories that ranges from most sensitive (SEA Resource Cat 1) to less sensitive (SEA Resource Cat 4). Resource Cat 4 encompasses the habitats that are not considered sensitive or rare that support the majority of common species of plants and animals. The Ordinance approaches protection of common species through the preservation of their habitats rather than implementing specific protections for individuals.
X.5	Please include second growth desert to ecosystem functions valuable to the resilience of the SEAs.	Antelope Acres TC	Added "early successional" to definition of SEA Resource Cat 5: "...includes disturbed, early successional, or isolated...". Also revised language about Cat 5 in the Guide in Chapter 4 (page 35).
X.5	Not clear precisely how this "Category 5" will be implemented. For instance, if a 20-acre parcel of land within the SEA in Acton is covered by Russian Thistle or Wild Mustard or other non-native species, but there is one Juniper tree and one Horny Toad found on the property, would it be considered "Category 5" (due to the "dominating" presence on non-natives) or "Category 2" (due to the presence of a single Juniper tree) or "Category 3" (due to the presence of a Horny Toad)?	Acton TC	<p>No action. SEA Resource Category 5 is not part of the development standards but was included in the definitions to show how Cat 5 can help to meet Finding 3 in Section 22.102.080.D.3 (Page 28) of the Ordinance. The Guide describes the purpose and use of Resource Cat 5 in Chapter 4 (page 35).</p> <p>If a Cat 1,2,3 or 4 species occurs within Cat 5, the area occupied by the Cat 1-4 species will be treated at the level of protection for that species.</p> <p>Setbacks for protected trees must be met regardless of the SEA Category they occur in.</p>
X.5	Realistically, you're going to have a mix of non-sensitive native (e.g. laurel sumac, ceanothus, most manzanitas, opuntias, etc.) and non-native species, in a fragmented habitat that transitions to being more intact in the direction of the SEA. Suggestion: Positively describe non-sensitive native species as belonging to either Resource Category Level 4 or 5, or create a category that comports with this more common, mixed existing condition.	Stephen Maxwell (AV resident)	No action. SEA Resource Categories account for a certain amount of non-natives occurring in these natural communities as defined by CDFW in the Online Manual of CA Vegetation.

Y	"Sensitive Local Native Resources" (at pg. 9) should be provided as an appendix to the Implementation Guide and be regularly updated and required to be posted on the County's website.	CNPS & CBD	Sensitive Local Native Resources List is provided as Appendix B in the Guide. This list will be updated regularly. All the appendices will be posted on the SEA website after the Ordinance is adopted. Please see the Resources page of the SEA website:  <a href="http://planning.lacounty.gov/site/sea/resources/">http://planning.lacounty.gov/site/sea/resources/</a>
AA	Please include sources of surface water as seasonal or permanent.	Antelope Acres TC	Added "permanent or intermittent" to Water resources" definition. The definition was also added to the Guide Glossary. Language was included in Chapter 4 in the Guide (page 36) to clarify that intermittent waters are equally protected.
BB	Please add insects, such as butterflies, native bees, flies, grubs and other such insects that provide food for lizards and birds.	Antelope Acres TC	No action. The word "Invertebrates" covers all types of insects.
<b>22.102.030 (Applicability) in Public REVIEW Draft (March 2018)</b>			
A	Re-evaluate and define what is "deemed complete" application	B. Peterson, D. Madsen, E. Eichinger, J Thomas, J. Byrne, L. Baldwin, M. Seidler, M. Strehlow, M. Paulson, P. Byrne, R. Kikuchi, R. Reynolds, T. Wang, W. Kamen, N. Staddon, D. Louis, N. & H. Applebaum, D. Shea, G. Walter, B. Perry, Wanda Shimazu, Celia Kutcher, Sierra Club, Sierra Club-SGV, Sierra Club-Diamond Bar, Hills For Everyone, HOSEC	No action. We will be keeping the same applicability language that allows applications submitted prior to the ordinance update to be subject to the current 1982 ordinance. Our Current Planning division will be identifying inactive cases and will be taking the appropriate steps to deny projects due to inactivity.
A	I want to respond to the question of grandfathering in applications for land use in the Rowland Heights Hills. I do not want to see anymore construction in these hills. The new SEA plan looks like a good plan to help eliminate over development of this area. We need to preserve this land for the plants and animals that live there.	Jacqueline Bennett	No action. We will be keeping the same applicability language that allows applications submitted prior to the ordinance update to be subject to the current 1982 ordinance. Our Current Planning division will be identifying inactive cases and will be taking the appropriate steps to deny projects due to inactivity.
A	First, as a community we would like to see any new protections offered under the new SEA to impact all development within our SEAs, both those yet to be permitted and those that have already been granted their county permits. No grandfathering of old projects and I'm speaking specifically the AERA Energy project and the Pacific Heights project in our community.	Mike Hughes	No action. We will be keeping the same applicability language that allows applications submitted prior to the ordinance update to be subject to the current 1982 ordinance. Our Current Planning division will be identifying inactive cases and will be taking the appropriate steps to deny projects due to inactivity.
A	The SEA Ord IG states that the SEA Ord is not required to be applied to pending projects whose applications have been deemed complete prior to adoption of the SEA Ord. Please re-evaluate and define what is deemed a complete application prior to this SEA Ord going into effect. The new SEA rules should apply to the AERA property. This project was proposed 15 years ago and all studies and evaluations are outdated.	Puente Hills Habitat Authority	No action. We will be keeping the same applicability language that allows applications submitted prior to the ordinance update to be subject to the current 1982 ordinance. Our Current Planning division will be identifying inactive cases and will be taking the appropriate steps to deny projects due to inactivity.
A	Please have the SEA Ord apply to all projects within SEAs that have not yet completed their CEQA review or that need to update their CEQA documents regardless of their application status. Since the priority of the SEA Ord is to balance preservation of the County's natural biodiversity with private property rights, it makes sense that all projects with incomplete CEQA documents be reviewed for compatibility with the new ordinance.	Puente Hills Habitat Authority	No action. We will be keeping the same applicability language that allows applications submitted prior to the ordinance update to be subject to the current 1982 ordinance. Our Current Planning division will be identifying inactive cases and will be taking the appropriate steps to deny projects due to inactivity.

A	Sections 22.102.020(J)(4) (Definition of Development) and 22.102.030 (Applicability) of the Ordinance would require that SCE obtain discretionary approvals from the County prior to conducting infrastructure maintenance activities (such as the replacement of deteriorated or overloaded poles) since they fall within the expansive definition of "development." Pursuant to CPUC General Order 131D, SCE is required to consult with jurisdictions; however, the CPUC has clarified that SCE is not required to seek discretionary approvals such as Conditional Use Permits for activities regulated by the CPUC. These activities include the design, placement, and maintenance of SCE transmission and distribution systems (e.g. distribution and transmission lines, substations, etc.). Accordingly, the County would be expressly preempted from enforcing these requirements against SCE installations. See San Diego Gas & Electric Co. v. City of Carlsbad, 64 Cal. App. 4th 785 (Cal. App. 4th Dist. 1998) (City preempted from enforcing requirements where CPUC has either expressly or implicitly entered the field of regulation).	SoCal Edison	No action or changes to language. PCN certificate, order, rule will supersede County zoning code. Any activity under a PCN certificate, order, rule is already exempt from this ordinance.
D & E	Why was this crossed out in Section 1, page one?		No action. Need more information as to which part the commenter is referring to. Section 1 contains edits or deletion of language from the 1982 SEA ordinance. If there is a deletion, it is because the new language in the new draft will supersede it.
<b>22.102.040 (Exemptions) in Public REVIEW Draft (March 2018)</b>			
	This is very confusing and unclear. Could it be explained in more simple terms?	Antelope Acres TC	No action. We are striving to make the language in the ordinance more accessible. We also welcome members of the public to contact us for more clarification on certain language.
	suggests adding language that reinforces the fact that an SEA permit is not required for the listed exemptions. BIA requests that §22.102.040 be revised to read (requested change underlined): "The following developments are exempt from the regulations of this Chapter, <u>and shall not require an SEA permit.</u> Development that does not qualify for any of the exemptions listed below is subject to the regulations of this Chapter."	BIA	No action. Current draft language already says "exempt from the regulations of this Chapter" at the beginning of the Exemptions section 22.102.040.
	SCE respectfully requests that the County clarify that the Ordinance does not apply to the design, siting, and maintenance of electrical infrastructure that is under the jurisdiction of the CPUC. Therefore, SCE proposes the following text (in red font) be added to Section 22.102.040 Exemptions. P. Electrical power transmission and distribution lines and associated equipment owned or operated by publicly regulated utilities that are subject to regulation by the California Public Utilities Commission.	SoCal Edison	No action or changes to language. PCN certificate, order, rule will supersede County zoning code. Any activity under a PCN certificate, order, rule is already exempt from this ordinance.
	I am writing to urge the Department of Regional Planning to recommend a motion to rescind the section of the Board of Supervisors' motion passed November 12, 2014 that exempts the Antelope Valley from SEA review for SFR's and agricultural use. One of the more exasperating aspects of living in Los Angeles County is tendency of the County Supervisors to place the concerns of commercial interests over the legitimate concerns of County residents. The Planning Department has an important role to play in highlighting this issue. Let me spell this out plainly. In the 20 years I have lived here I have found that there is one thing residents here agree on regardless of their politics. That is that they are opposed to any measure that would threaten or change the rural and natural character of the western Antelope Valley. Most residents live here because of these features. Therefore, we are not in need of "protection" against SEA review regulations put in place to protect precisely those features.	Mark Christiansen (Green Valley resident)	No action. Your comment letter will be provided to the Regional Planning Commission for their consideration.
	BIA suggests adding (P) to Section 22.102.040 to exempt "Lot line adjustments."	BIA	No action. Since lot line adjustment is not considered as "development", it is not subject to the SEA ordinance. No exemption is needed.

	<p>BIA suggests adding (Q) to Section 22.102.040 to exempt “Ground Disturbance Activities” and the following activities as exemptions:</p> <ol style="list-style-type: none"> <li>1. Implementation of mitigation (installation, maintenance, and monitoring), including habitat restoration, expansion, enhancement, and removal of non-native or invasive species;</li> <li>2. Testing and survey activities conducted pursuant to environmental analysis prepared pursuant to the California Environmental Quality Act;</li> <li>3. Activities on lands within the historic limits of existing agricultural operations and production, including lands that are fallow as part of long-term crop management. Agricultural operations may include, but are not limited to, irrigated and non-irrigated farmland, nurseries, fruit stands, and composting facilities. Agricultural operations and production include access to, installation, repair, and maintenance of agricultural related infrastructure;</li> <li>4. Activities associated with existing managed grazing lands for traditional livestock (including resource management) and the construction and maintenance of corrals, barns, sheds, fencing, water systems, and access roads as an accessory use, as allowed by this Title 22 and other applicable County regulations, including, but not limited to, regulations related to time of year, County wildlife preserves, and hazardous dust conditions;</li> <li>5. Activities associated with existing oil and gas operations, including maintenance of wells, pipelines, tanks, fencing, sheds, access roads, and equipment and material storage;</li> <li>6. Activities associated with required alterations in previously developed areas within a SEA (e.g., upsizing an existing utility);</li> <li>7. Maintenance of existing facilities located within a SEA (e.g., grading and vegetation removal necessary to provide continued access); and</li> <li>8. Construction of County master planned highways and master planned trails.</li> </ol>	BIA	<p>Please see the following responses:</p> <ol style="list-style-type: none"> <li>1. Approved mitigation will already be covered by a SEA CUP. Habitat restoration, i.e., Invasive removals, is covered under 22.102.140 - Review Procedures for Habitat Restoration Projects.</li> <li>2. Please give examples of such ground disturbing tests or surveys required by CEQA.</li> <li>3. Added clarifying to the Ordinance Section 22.102.040.A.3 that specifies only agricultural uses in previously disturbed farmland are exempt. Added a development standards for crop in Section 22.102.090.E.1 that allows for Ministerial SEA Review for crops.</li> <li>4 &amp; 5. Maintenance of legally established structures and roads are not considered development. However, new construction of those facilities will be considered as development and subject to the SEA ordinance.</li> <li>6 &amp; 7. Exemption C of the Ordinance may be used to exempt such activities.</li> <li>8. County master plans are considered county projects regardless of who will be conducting construction operations. Please see Chapter 10 of the Guide (page 84) for more information.</li> </ol>
	<p>Exempt Government Open Space Land Managers from the ordinance. Organizations and esp public land management agencies that do not collect public tax dollars and whose main mission are in alignment with the goals of the ordinance, should be considered exempt from the ordinance including its fee structure. Govt organizations are held accountable to a higher standard of transparency and due diligence in their process and conduct. To add an extra layer of regulation over an agency that specializes in habitat protection is a potential misapplication of public funds.</p>	Puente Hills Habitat Authority	<p>No action. State and Fed agencies are not subject to local ordinances. County land management will be covered through County Projects Review Process in Section 22.102.130.</p>
	<p>Because the management activities of the Habitat Authority are preexisting and/or covered under our current Resource Management Plan (RMP), they do not need land use permits or SEA Review. This means the SEA Ordinance would not apply to the Habitat Authority for the following:</p> <ul style="list-style-type: none"> <li>- annual fuel modification clearing efforts within the Preserve (mostly adjacent to homes)</li> <li>- annual maintenance of the roads/trails within the Preserve by the Habitat Authority, Fire Dept, or a property easement holder</li> <li>- trail maintenance, trail rerouting and trailhead parking lot maintenance</li> <li>- erosion control</li> <li>- nonnative vegetation removal</li> <li>- habitat restoration (existing and new). However, at your request we would be happy to share for your information our future habitat restoration plans for the larger projects. It is our understanding that community volunteer efforts will be consistent with the RMP guidelines and will not have a formal plan.</li> <li>- maintenance of legally established structures such as our residence and barn in Sycamore Canyon</li> <li>- scientific studies</li> <li>- passive recreation</li> <li>- other general management activities</li> </ul>	Puente Hills Habitat Authority	<p>No action. Activities that fall under an current RMP that has undergone CEQA review prior to the adoption of this Ordinance will not be subject to the SEA Ordinance.</p>
	<p>It is our understanding that if we want to update our RMP in the future, a County Biologist would review to ensure consistency with the SEA Program, and there would be no fee for this.</p> <p>Other new situational activities, such as demolition of an underground water tank would require the same level of review for SEA Ord compatibility as any other project that requires a land use permit</p>	Puente Hills Habitat Authority	<p>No action. Correct, an update to the RMP will require a review by the County Biologist (without charge) to confirm consistency with the SEA Ordinance. Other development activities will be subject to the SEA Ordinance and its review process.</p>

A.1	<p>We remain concerned over a past Board decision regarding the Antelope Valley that created overly broad exemptions not applicable everywhere else in the County. Specifically, the exemptions for single-family homes and disturbed farmland in the Antelope Valley should be removed. Ordinance compliance for single-family homes is hardly onerous now that a simple ministerial process is in place. Disturbed farmland is also important, as it may be in the process of recovery and/or part of an intact habitat block.</p> <p>Given the presence of divergent points of view on the exemption within the Antelope Valley community, we urge the Department to enact measures to at least mitigate its adverse consequences. For example, the exemption could apply to development footprints only below a reasonable size threshold that avoid sensitive resources. This would allow common uses to be exempt and at the same time limit the potential damage to SEA resources.</p>	EHL	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
A.1	<p>main objection to the SEA Ordinance is the exemption of the Antelope Valley Significant Ecological Areas from review for Single Family Residential development and agricultural use. I also understand subdivisions, commercial development, and specific plans must apply for a conditional use permit and undergo SEA review, but I have serious concerns that SRF and agricultural exemptions will have real impacts on natural areas in my community and SEAs across the Antelope Valley. Why did the County identify SEAs in the Antelope Valley if they do not offer the same level of review and protection to similar SEA Resources in the rest of the County? I respectfully request that Regional Planning recommend a motion to rescind the portion of the Board of Supervisors Motion passed November 12, 2014 that exempts the Antelope Valley from SEA review for SFRs and agricultural use, with which all other parts of Los Angeles County must comply, and whose SEAs provide improved quality of life, cultural benefits, special hazards protections, and enjoyment through, to the greatest extent possible, protection of natural resources via the SEA Ordinance and its implementation.</p>	Linda Schulz (Lake Hughes resident)	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
A.1	<p>object to the SEA Ordinance exemption of the Antelope Valley Significant Ecological Areas (SEA) from review for Single Family Residential (SFR) Development, Economic Opportunity Areas (EOAs) and agricultural use. The exemptions will contribute to infringement on wildlife corridors and fragmentation of natural communities , many of them providing habitat for protected species and species of special concern, supporting species protected by the Migratory Bird Treaty Act and the Golden and Bald Eagle Protection Act. Furthermore activities having adverse impacts on biological resources may be prevented from claiming a categorical exemption determination under CEQA and might be subject to other regularity conditions according to California Department of Fish and Wildlife code. To achieve protection, require a discretionary permit and biological review for SFR, SEAs and agricultural activities in all SEAs. The AV exemptions in the Ordinance run counter to SEA guiding principles and AV residents wont be able to benefit from protection, cultural services, and ecosystem services that SEAs provide. recommend a motion to rescind the portion of the Board of Supervisors Motion.</p>	Merrylou Nelson	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
A.1	<p>to request that the Antelope Valley Significant Ecological Areas (SEA's) NOT be exempted from the same rules as the rest of the county for Single Family Residences, agricultural use, or Areas of Economic Opportunity. These SEA's are vital to wildlife and should not be gradually degraded by not affording them the protections that they deserve. Please request that the Board of Supervisors rescind the motion that they passed in November of 2014 that exempted the Antelope Valley from proper protections.</p>	Karen Graham (Lake Hughes resident)	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
A.1	<p>Wrong for planning staff to consider reversing BOS motion. The exemption was thoughtfully designed by BOS to support the construction of a single family residence by an individual, on an individual lot. Without exemption, some properties could become virtually worthless. There are many properties in the AV which are currently considered low value due to excessive costs and other limiting factors associated with development in the county. The cost impact will be greatly magnified if the SEA exemption is removed from these individual parcels and may cause many of these properties to drop below the low value threshold to that of becoming valueless.</p>	GAVAR	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
A.1	<p>Opposed to exemption of AV from the SEA Ordinance regarding SFR and agricultural use. San Andreas, AV and Santa Clara River SEAs encompass majority of SEA land within LA County. Exclusion of the AV is unreasonable and corrosive to the very concept of SEAs. These important and biologically diverse areas warrant preservation and protection. Respectfully request that DRP recommend a motion to rescind the section of the BOS motion that exempts AV from SEA Review for SFR and agriculture uses.</p>	Lakes TC	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.

A.1	<p>Expressed sincere appreciation for adhering to the BOS motion. Specifically, and upon learning that the Santa Clara River SEA Boundary expansion would engulf more than 1/3 of Acton and include many square miles of land that supports none of the target biological species that the SEA was intended to protect,<sup>1</sup> the Board of Supervisors adopted the Santa Clara SEA Boundary with the proviso that residential development and associated accessory uses in the Antelope Valley Area Plan would be exempted from the SEA Ordinance<sup>2</sup>. The Acton Town Council is grateful that the Draft Ordinance is consistent with prior Board of Supervisor determinations in a manner which recognizes that low-density rural residential and animal keeping uses are not per se in conflict with biological resource protection objectives.</p> <p>CDFW recommends that the Ordinate include language that informs that all activities conducted in an SEA are subject to applicable state and federal laws regardless of Ordinance exemption status provided by the County.</p>	Acton TC	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
A.1	<p>This section describes exemptions to the Ordinance including the building of single family homes (SFH) of any size that are within the boundaries of the Antelope Valley Area Plan (AVAP) as being exempt from the Ordinance.</p> <p>CDFW recommends the County not provide Ordinance exemptions for SFH construction anywhere in the County within designated SEAs. CDFW is concerned that development within SEAs without the County requiring biological constraints analyses could lead to assumptions by the regulated community that activities are not subject to additional applicable regulations protective of biological resources. CDFW is particularly concerned regarding regulations under our purview, including protection for listed species (Fish and Game Code § 2050 et seq.), nesting birds (Fish and Game Code § 3500 et seq.), and alterations conducted within waters of the state (Fish and Game Code § 1600 et seq.).</p> <p>CDFW recommends that the Ordinate include language that informs that all activities conducted in an SEA are subject to applicable state and federal laws regardless of Ordinance exemption status provided by the County.</p>	CDFW	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
A.1	<p>We point out the potential for these exclusions to cause fragmentation and isolation of ecosystems, habitats, and corridors. Moreover, piecemeal development via Single Family Residences that have no limitation on “development” activities or required preservation will threaten viability of biological resources the SEA Ordinance seeks to preserve. Activities having adverse impacts to biological resources may be prevented from claiming a categorical exemption determination under CEQA and might be subject to other regulatory conditions according to California Department of Fish and Wildlife code. No matter the impetus for the Supervisors' motion that directed exclusions, we support requesting a rescission of the exemptions mentioned that will deleteriously affect the Antelope Valley SEAs that are so important to our work in preserving transitional habitats, protecting our conservation lands, and protecting public trust lands as well.</p>	Transition Habitat Conservancy	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
A.1	<p>single family residences and associated landscaping, animal keeping facilities, etc., should not be exempt from further review.</p>	CNPS SG Mountains	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
A.1	<p>Furthermore, piecemeal development in the form of Single Family Residences that, because of their exclusion in Antelope Valley SEAs provided by the ordinance, have no limitation on “development” activities or required preservation, and will ultimately threaten viability of biological resources the SEA Ordinance seeks to preserve. Clearing of vegetation around homes and commercial development for purposes of fire prevention and control can also alter the integrity of biological resources, and should be considered “development” and included in the total footprint of projects, and subject to discretionary review as indicated by CDFW, this recommendation that “ the County avoid exempting from CEQA as a ministerial action (CEQA guideline 15268); single family homes, agriculture use, and other non-emergency activities within the SEA until it is determined the activities would not have a significant impact on biological resources or potentially result in impacts to waters of the state” (CDFW Letter, SEA Ordinance, Draft 6, November 24, 2014).</p>	Three Point-Liebre Mountains TC	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.

A.1	I am strongly encouraging you to keep the SFR exemption in the drafts/ordinance. If the SFR exemption were to be removed, many of our property owners and would-be Buyers would see property values drop sharply and the SFR building process becoming more time-consuming, frustrating and expensive. Please keep the SFR exemption in place in the draft(s), in the ordinance if/when passed, and into the future.	Roe Leer	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
A.2	Concerned by the very short (3 year) window that is provided for land to qualify as "Previously Disturbed Farmland"; there are a number of reasons why farmland may remain unworked for more than 3 years, including economic hardship following fire damage or drought. Moreover (and in the Antelope Valley in particular), it takes more than 3 years for native vegetation to become re-established, thus the 3-year time frame set by the Draft SEA Ordinance does not appear reasonable from a biological resource perspective. The Acton Town Council respectfully requests that the Department of Regional Planning explain how the 3-year window was established and why it is necessary.	Acton TC	<p>Changed time period in the Ordinance to 4 years to align with State Mapping framework. Native vegetation starts to reestablish and wildlife begins to move back into a fallow field within this period of time. If a field is left fallow for more than 4 years, it's value as habitat needs to be assessed prior to disturbance. Added clarifying language to Exemption A.3 in Ordinance and in Chapter 4 (page 43) and Chapter 5 (page 49) in the Guide.</p> <p>Also added an avenue for Ministerial SEA Review for crops as a primary use if established within SEA Res Cat 5. A BCM and SEA-Counseling will be required but if there are no SEA Cat 1-4 resources in proposed development area for crops, then only a Ministerial SEA Review is required. See Section 22.102.090.E.1.</p>
A.2	<p>This section describes that the development on farmland within the boundary of the AVAP is exempted from the Ordinance and states. "All previously disturbed farmland as defined by Section 22.102.020 (Definitions)."</p> <p>Definition V under Section 22.102.020, states. "Previously disturbed farmland means farmland not grazed by domestic stock identified within the State of California Farmland Mapping and Monitoring Program (published in 2017) that has been inactive for a period of less than three consecutive years."</p> <p>The Farmland development Ordinance exemption in Section 22.102.040 (A)(2) appears to conflict with the Resource Category defined in Section 22.102.040 (X)(5) that states. "SEA Resource Category 5 includes disturbed or isolated resource elements, such as plant communities dominated by non-native species, agricultural fields, hedges, and non-native trees, which continue to provide habitat and movement opportunities for wildlife, buffers between development and wildlands, and ecosystem functions valuable to the resilience of the SEAs."</p> <p>CDFW recommends that the Ordinance clarify if "agricultural field" and "farmland" are intended to refer to similar or different meanings for the purposes of affording the exemption and Resource Category value as defined in the ordinance. Given that inactive farmland and agricultural fields provide similar beneficial wildlife habitat value, CDFW recommends Exemption 2 under Section 22.102.040 (A) be removed from the Ordinance.</p>	CDFW	<p>Added clarifying language to Exemption A.3 in Ordinance and in Chapter 4 (page 43) and Chapter 5 (page 49) in the Guide. SEA Resource Cat 5 is not a protected category. It is defined in the Ordinance as we recognize agricultural lands do have biological value. Exemption A.3 applies only for agricultural uses on previously disturbed farmland. Please see the definition for "Previously Disturbed Farmland". If other uses are proposed on previously disturbed farmland, it will be subject to the SEA ordinance.</p>
A.2	We put forth the recommendation to evaluate agricultural land, to include grazing, based on the supporting information listed above, conducted on a case by case basis. Furthermore, we question whether the BOS Motion was sufficiently reviewed for compliance with CEQA before its changes were inserted into the Antelope Valley Area Plan, when incremental build-out or agricultural/livestock use, being "development," as defined in the Draft 9 SEA Ordinance, would constitute notable and cumulative impacts in SEAs.	Three Point-Liebre Mountains TC	<p>Added clarifying language to Exemption A.3 in Ordinance and in Chapter 4 (page 43) and Chapter 5 (page 49) in the Guide. The exemption only applies to lands previously used for agricultural and has a limited period of time that can be left fallow.</p>
A.2	We recognize and support agricultural resources and their value to wildlife in areas of the Antelope Valley. Audubon identifies the Antelope Valley as an Important Bird Area, where bird life has flourished in irrigated agricultural fields—which further support a variety wildlife, including special status species and those protected by state and federal statutes. Renewable energy development and water adjudication will continue their contribution to fallowing of farmland, which makes preservation of existing agriculturally zoned properties, especially in SEAs, more important. Careful consideration must be undertaken in determining the value of even "previously disturbed" and "grazed" farmland, supported by statements from SEA Technical Advisory Committee Procedures Guidelines, County of Los Angeles Department of Regional Planning, March 2004". The definition provided in the SEAO referencing "disturbed farmland" as having been inactive for a period of less than three years, and excluded from review should be rethought, and for the reasons stated above, we request any proposed agricultural activities or development, even on lands with SFRs, and/or supporting livestock with risk of overgrazing, require review and some form of discretionary permit.	Transition Habitat Conservancy	<p>Added clarifying language to Exemption A.3 in Ordinance and in Chapter 4 (page 43) and Chapter 5 (page 49) in the Guide. The exemption only applies to agricultural uses on lands previously used for agriculture and has a limited period of time that can be left fallow.</p>

A & B	The SEA ordinance needs to incorporate consistency between A. and B. (at pg. 11-12) and adopt the more protective requirements currently under B. Most of the remaining natural landscapes, currently unaltered by human activities, remain in the Antelope Valley Area Plan (AVAP) of Los Angeles County and would benefit from consistent application of the SEA ordinance conditions. As currently written, the SEA ordinance would allow greater impacts to occur in the AVAP than in other parts of the County. No justification is provided for the disparity in conditioning different parts of the County's SEAs to different conditions.	CNPS & CBD	An Alternative Option for Antelope Valley exemptions was submitted in the Hearing Package for the Commission's consideration.
B.1	Under the ordinance Section 22.102.040 (B)1., the specific total building site and areas that would be exempted for additions and modifications are listed as not increasing "20,000 square feet, or encroach into more than 10% dripline for up to four SEA Native Trees." Our membership feels that this type of specificity may not be appropriate in all cases and is too prescriptive. That should be noted throughout the ordinance, including; SEA Development Standards §22.102.080 (A) 2. (a.), 5., (B) Water Resources (Table), (C) 6. & (D) 3., (B)and §22.102.90 Open Spaces (A) 3.	BIA	No action. This exemption was formulated to be prescriptive and detailed so that it is clear what type of development may be exempt. No changes to the language were made.
D	<p>SCE's ability to perform timely, and at times immediate, maintenance of our existing electrical infrastructure is critical in meeting CPUC mandated and federal requirements to provide a safe and reliable electrical grid. Therefore, SCE proposes the following text (in red font) be added to Section 22.102.040 Exemptions (D), (H), and (J).</p> <p>D. Maintenance, minor additions, or changes to existing legally established development previously reviewed for impacts to SEA Resources <b>or otherwise authorized by a state or federal regulatory agency</b>, if:</p> <ol style="list-style-type: none"> <li>1. Maintenance, additions, or changes do not expand the previously approved development footprint; or</li> <li>2. Maintenance, additions, or changes are operating under a valid use permit and found to be in substantial compliance with such permit.</li> </ol>	SoCal Edison	No action or changes to language. PCN certificate, order, rule will supersede County zoning code. Any activity under a PCN certificate, order, rule is already exempt from this ordinance.
D	Define "minor additions"	Caltrans	No action. Based on current practices and described in page 50 in the Guide, minor additions or changes that require a Revised Exhibit A shall not exceed 10% of the approved project.
D & E	development permitted prior to the expansion of an SEA mapped area would not have been previously reviewed for impacts to SEA resources. Instead, former versions of the ordinance stated that, "Any development authorized by a valid land use approval, or permit authorized by this Title 22, that was not subject to Section 22.56.215 as it existed prior to the effective date of the ordinance establishing the former section. In such cases, the development shall be governed by the land use approval or permit during the life of that grant." This language would be more appropriate in defining an exemption for a previously existing, legally established development.	BIA	No action. Projects in SEA expanded areas that were not previously reviewed for environmental impacts are subject to the SEA ordinance. If there was an adequate CEQA analysis, that may be used to substantiate an exemption.
F	<p>Pursuant to the Draft SEA Ordinance, it appears that several important non-residential uses in Acton (including local water haulers and animal rescue operations) that have existing CUPs may be required to undergo the "SEA CUP" process (including a biological assessment) when they renew their CUP even though there are no proposed changes to, or expansion of, these existing uses. During a recent public meeting, it was conveyed that this requirement is imposed by the Draft SEA Ordinance because DRP wants to "see what's there" on the property where these uses occur. The Acton Town Council is concerned that mere curiosity is not a sufficient reason to impose an onerous SEA CUP process on existing uses that do not seek to make any changes and which serve a vital community function (particularly since renewal of such CUPs are exempt from CEQA3). Therefore, the Acton Town Council respectfully requests that DRP set forth the following:</p> <ol style="list-style-type: none"> <li>a) Substantive reasons why it is necessary to require existing CUP holders that do not propose operational or facility changes to undergo the SEA CUP process;</li> <li>b) The specific objectives that DRP hopes to achieve by requiring existing CUP holders that do not propose operational or facility changes to undergo the SEA CUP process;</li> <li>c) The various ways in which existing CUP holders could be affected (and by extension, how Acton will be affected) by requiring them to undergo the SEA CUP process.</li> </ol>	Acton TC	No action. Existing CUPS that were not previously reviewed can have continuous effects on the environment and will need to undergo a current environmental analysis at renewal of the CUP to identify practices that are continuing to degrade SEA resources and determine appropriate mitigation measures. If there was an adequate CEQA analysis, that may be used to substantiate an exemption.

G	Also, adopted Specific Plans should not be entirely and forever exempt. Specific Plans are zoning, with no vested rights. Sometimes unbuilt after decades, they often become outdated and “stale,” not reflecting contemporary planning or resource needs. Re-planning for SEA compatibility is an important option that should not be foreclosed. A time limit should be set for adopted specific plans, such as 10 years from the date of original adoption.	EHL	Added clarifying language to the Guide in Chapter 5 (page 50).
H	The rebuilding and replacement of legally built structures (including utility infrastructure) which have been damaged or partially destroyed and will not increase the previously existing development footprint.	SoCal Edison	No action. This exemption is intended for single family residences or small scale uses. Rebuilding of utilities cannot be exempt per this exemption.
H	This portion of the exemptions refers to the “rebuilding and replacement of legally built structures which have been damaged or partially destroyed and will not increase the previously existing development footprint.” BIA suggests that County staff should currently have the ability to approve these types of changes to a structure if regulations requiring replacement require it or if it can be demonstrated that it wouldn’t affect sensitive vegetation.	BIA	No action. This exemption allows for rebuilding with required alterations per building code as long as the development footprint does not change. Development footprint includes fuel mod zones. As long as the new construction does not require expanded fuel mod zones, then this exemption applies.
J	Add language in red: Legally required fuel modification and brush clearance activities, as approved by the Fire Department or as required by state or federal regulations, associated with existing structures for the purpose of fire protection.	SoCal Edison	No action. PCN certificate, order, rule will supersede County zoning code. Any activity under a PCN certificate, order, rule is already exempt from this ordinance.
K	surface mining and other exploratory activities should not be exempt from further review.	CNPS SG Mountains	Revised Ordinance language for clarity. This exemption is only for periodic reviews for approved surface mining and reclamation plans during the life of the grant and not proposing any changes. New surface mining and exploratory activities are not exempt from this ordinance.
M	<p>This is arbitrarily limiting. The CEQA review for a project may conceive of additional mitigation not required by these Titles, such as the planting of additional native trees. I personally would like to grow native trees on my lot within the bounds of the SEA (both inside and outside of fuel mod zones), because I find them to be beautiful. This is something my neighbors have done on their properties, and we can all agree that it's a good thing. However, it is technically "development" under the terms of the ordinance. I do not want to have to pay money for a use permit to be told I can plant native trees on my property. I do not want ornery neighbors with agendas to "get me" for doing this because I violate County Code to develop without a permit. The County Code should not deny me the ability to "develop" the SEA on my property with native plantings, or to replace those native trees that become diseased or senescent, or to comport in any other way that conforms with the development standards.</p> <p>Revise the language to read: "Development where the only impact to SEA Resources involve the planting of SEA Native Trees." or "Development where the only impact to SEA Resources involve the planting of SEA Native Trees, as required by Titles 21 or 22 or pursuant to a use permit." This latter language would formalize that the planting of trees could be part of the project, even if the planting of such trees was not required by County Code. When I go to develop, and I get my use permit, I could then include the planting of these trees as a part of the project, an approach commonly taken under CEQA. The disturbance to ground vegetation would already be subject to discretionary review as a part of that use permit. Please also note that there are a significant number of parcels for which only a portion of the parcel is located on a SEA. I should be able to place inside the SEA mitigation for resources removed outside the SEA. The habitat value is higher, and it would be arbitrary to limit this when I am already required to alter the SEA with fuel modification requirements.</p>	Stephen Maxwell (AV resident)	Added a new exemption for introduced trees. Please see Exemption P in the Ordinance and Chapter 5 in the Guide (page 52).
<b>22.102.050 (SEA Counseling) in Public REVIEW Draft (March 2018)</b>			
	SEA Counseling has no meaningful review due to unpermitted vegetation removal. There is no habitat left to preserve by the time the County is involved in the process. SEA Counseling may make it easier for County Staff by minimizing workload but does nothing to enforce the alleged intent of the ordinance.	Leona Valley TC	An enforcement section was added to the Ordinance. Please see Section 22.102.110 in the Ordinance.

	<p>BIA also requests that Section 22.102.050 (C) be added to the ordinance to expand applicability requirements, including additional permitted uses subject only to ministerial review. We recommend the following:  “C. Ministerial SEA Review. The following activities shall be presumed to comply with Section 22.102.080 (SEA Development Standards) and only a ministerial SEA review pursuant to Section 22.102.060 shall be required:  1. Activities to improve the quality of biological or water resources in an SEA, such as, but not limited to:  a. Non-native vegetation removal programs;  b. Native Habitat restoration programs; and  c. Construction of wildlife crossing structures  2. New crops as follows:  a. Personal crops that exceed one acre in size; and,  b. Commercial crops of any size.  3. Vegetation removal as follows:  a. Vegetation removal in excess of what is required for the placement of permitted structures, accessory structures, access, fuel modification areas, and paths; and  b. Vegetation removal not associated with the development of an approved permit.”</p>	BIA	No action. The SEA assessment is impact-based and will not be determining review type based on uses.
B	<p>As written, the ordinance requires that at the SEA Stop process the Regional Planning Director recommend “two subsections...” appearing to mean that the two recommendations listed under a. and b. have to both be adopted. However, a. and b. appear to be written as adopting one or another – not necessitating both for a ministerial review, and an SEA Conditional Use Permit. To provide clarity and eliminate confusion, we recommend that the §22.102.050(B) be revised to read (requested change underlined):  “Recommendation. The Director shall recommend at the SEA Stop one of the following two subsections:”</p>	BIA	Added "one of" to Section 22.102.050.B of the Ordinance.
B	<p>"SEA-Stop" - This semi-acronym must be county-speak for a checkpoint or next step in a procedure made up of reviews. Why not call it like it is?   A recommendation either approves a project or not. If all is well then a project goes ahead. If a project is not approved it gets more chances to be approved by having more evaluations, paying permit fees or by mitigation with a land exchange or credits. Wouldn't it be more likely that the ordinance will eventually approve any project of a significant ecological area?</p>	Antelope Acres TC	<p>Will be using SEA Counseling only for future clarification. A recommendation at SEA Counseling only gives recommendation of review track, Ministerial SEA Review only, Ministerial SEA Review with Protected Tree Permit, or SEA CUP.   A project that needs a SEACUP requires a public hearing by Regional Planning Commission with additional bio review, SEATAC review, discretionary review from planners, and mitigation measures.</p>
B.1	<p>Several concerns regarding the Director's Review and the ministerial SEA review.  1. No public notice of the ministerial review is identified  2. While ministerial approvals can be appealed once it is decided, without public notice, there is no opportunity to avoid appeals by upfront project improvements  3. Ministerial review would only require on-site mitigation, which may not always be appropriate  4. Tracking of the ministerial review is necessary for monitoring and identifying cumulative impacts</p>	CNPS & CBD	<p>No action. Please see the following answers:  1. Ministerial SEA Review (MSR) is not publicly noticed if tied to site plan review. If the MSR for the resource impacts is part of a standard CUP required for the use, then it will be noticed per the standard CUP requirements. The project would have met all SEA development standards and the SEA portion of the project will not be part of the discretionary review.  2. There are no appeals for MSR attached with a site plan review for the use. If the use itself requires a minor CUP or Standard CUP, you can appeal the use of the project. But the MSR will determine that project has met all SEA development standards.  3. Staff biologists will determine whether on-site mitigation is appropriate. If on-site open space preservation is not appropriate, then the project will require SEA CUP as it is not in compliance with Section 22.102.100.A.1.  4. Onsite open space preservation will be tracked through GIS.</p>

22.102.060 (SEA Review) in Public REVIEW Draft (March 2018)		
	BIA requests clarification under the SEA Review title, providing the word "Ministerial," makes it clear that this is meant to be a description of the ministerial process. We recommend that the title read, "SEA Review (Ministerial)."	BIA Added the word "Ministerial" to the title for clarity.
	The Ordinance allows ministerial review to be waived by the Director, but does not describe under what circumstances this might occur. While we can imagine circumstances for very small modifications where this might be appropriate, such modifications are already covered and described in the ordinance. Such arbitrary powers without definition or parameters could lead to abuse, as we believed happened in the recent behind closed doors extension of the Chiquita Canyon Landfill granted by the Director prior to permit approval. We ask that waiving of review be eliminated from the ordinance.	SCOPE No action. Ministerial SEA Review cannot be waived. Only SEA Counseling, which is a pre-application meeting, can be waived. Page 12 of the Implementation Guide lists when the SEA Counseling can be waived.
A.3.c	We recommend that under §22.102.060 (A) there should be clarifying language that refers back to the eligibility of projects to undergo a ministerial review based on the Director's recommendation. BIA requests that §22.102.060 be revised to read (requested change underlined): "A ministerial SEA Review <u>pursuant to this section</u> shall be required for any development <u>recommended by the Director pursuant to section 22.102.50, subpart B, and any development included in section 22.102.50, subpart C</u> , to determine compliance with the following:"	BIA No action. The recommendation made at the SEA Counseling is just a recommendation based on what is presented at the pre-application meeting. Any changes to the project design or scope may change the recommendation and review track. The language in the Ministerial SEA Review section is written to state what is required for a ministerial review.
22.102.070 (SEA Conditional Use Permit) in Public REVIEW Draft (March 2018)		
	A recommendation either approves a project or not. If all is well then a project goes ahead. If a project is not approved it gets more chances to be approved by having more evaluations, paying permit fees or by mitigation with a land exchange or credits. Wouldn't it be more likely that the ordinance will eventually approve any project of a significant ecological area?	Antelope Acres TC No action. For SEA CUPs, planners have the discretion to guide the applicant to produce a project that is least impactful to resources. A discretionary permit is more expensive and requires mitigation but the Ordinance is trying to balance preservation of resources and property rights. Discretionary permits require in depth review by staff and SEATAC.
	When does the Public Hearing take place in the review process? When is the public allowed to comment? How will the public be notified and what is the time frame for any comments on a project?	Antelope Acres TC No action. All SEA CUPs require SEATAC review. The public will have 2 chances to comment on the project: at the SEATAC meeting and at Regional Planning Commission (RPC) public hearing. SEATAC meeting happens first, before a RPC hearing date is scheduled, where SEATAC will discuss biological impacts. The RPC public hearing is the last step of the project. Notification of the public hearing is posted 30 days prior and the public has up to the hearing date to provide comments.
	Title: BIA requests clarification under the SEA Conditional Use Permit title, providing the word "Discretionary," makes it clear that this is meant to be a description of the discretionary review process. We recommend that the title read, "SEA Conditional Use Permit (Discretionary)."	BIA Added "discretionary" to text below title in Section 22.102.080.
A.3.c	Please define what cumulative means to the Planning Department. How much loss is needed to become cumulative?	Antelope Acres TC No action. Please see Chapter 9 in the Guide for more information on how the Department will track development and conservation in SEAs to evaluate cumulative impacts.
B.1.d	Who determines items that are "unnecessary"? Please state if it is the Director, that person's name and title.	Antelope Acres TC No action. The project planner, on behalf of the Director, will determine if there are unnecessary application materials to waive. An example would be if the project requires an Environmental Impact Report (EIR), a Biological Constraints Map may not be required since a more in-depth biological study will need to be done for the Biological Resources section of the EIR. This is described in Chapter 2 of the Guide
22.102.080 (SEA Development Standards) in Public REVIEW Draft (March 2018)		
	We ask that sufficient water for a viable habitat be added to the review criteria along with requirements for reduced hardscaping and permeable pavement where appropriate.	SCOPE No action. The County's Low Impact Development requirements for new construction includes promotion of permeable surfaces. Please give more clarifying information on "sufficient water for a viable habitat".

A	<p>It seems to the Acton Town Council that, unless members of the public and all the decisionmakers have particular expertise in biology, they will be incapable of understanding the distinction between SEA Categories 1, 2, 3, 4 and 5. Thus, it is impossible for either the public or the decisionmakers to fully understand the scope of the Draft Ordinance and grasp the extent to which it will impact affected residents and property owners.</p> <p>In particular, the Acton Town Council is concerned that essentially all of Acton lying within the Santa Clara SEA will be deemed at least "Category 2" (with an 80% or 4:1 "open space" CUP SEA restriction imposed by the "Guidelines") simply due to the ubiquitous presence of Junipers in Acton (which are neither rare, threatened, nor endangered but are included on the "tree species list" on page 78 of the "SEA Implementation Guide"). Even if this is changed, the portions of Acton lying within the SEA are still likely to be deemed Category 3 with a 75% (or 3:1) "open space" CUP SEA restriction due to the presence of a commonly found species; namely, the San Diego Coast Horned Lizard (aka the Horny Toad). Moreover, even if a proposed project in Acton is not subject to SEA CUP requirements, the "Guidelines" still require 66% of the land (which is a 2:1) to be preserved "on-site" and remain untouched because most of Acton is either Category 2 or Category 3 for the reasons mentioned above. The Acton Town Council is grateful that the current version of the Draft SEA does not impose such broad "takings" on residential and accessory uses in Acton, but if the residential/ accessory use exemptions are removed from the SEA Ordinance, then these broad "takings" will apply to nearly one-third of Acton's residential areas.</p> <p>Because of this, the Acton Town Council respectfully requests that the County demonstrate (based on technically quantitative evidence) that the 66%, 75%, and 80% "preservation ratios" set forth in the "Guidelines" are necessary, and that without them, the County will fail to achieve the biological resource protection policies established by adopted planning documents. For example, the Acton Town Council seeks to understand why the thousands of acres of Juniper woodland that is already preserved within and adjacent to Acton (through private land preserves, county holdings, and federal lands) is insufficient and why it is necessary to take an additional portion (up to 80%) of private land as "mitigation".</p>	Acton TC	The preservation ratios are calculated based on how much of the SEA Resources are impacted not the total area of resources present. SEA Counseling guides the applicant to site the development in areas with least impacts to the most sensitive resources.
A	recommends aligning the SEA Resource categories between the development standards and definitions sections. Add SEA Resource Cat 5 to Development Standards section	NPS	No action. SEA Resource Cat 5 is not mentioned in Section 22.102.090.A because it is already considered disturbed, fragmented, or of lesser value. However, SEA Resource Category 5 is referred in the Crops development standard, Section 22.102.090.E.1.
A	add text that considers the potential changes to plant and animal species level of sensitivity, as well as for habitat type that may transition from one Resource Category level to another. Biological resources should be evaluated based on the most current conditions. Updated field work and a revised biological report may be necessary if significant time lapses occur during the project permitting process.	NPS	Added timeframe for validity of Biological Constraints Maps and Biological reports and need for updating reports that do not fall in that timeframe in Chapter 6 of the Guide (page 63). SEA resource categories rely on formal lists and rankings so that SEA Category will automatically change for species and natural communities when their sensitivity levels on those lists change.
A.2.b	the definition of "disturbed" needs to be provided.	CNPS & CBD	Revised language in the Ordinance in Section 22.102.090.A.2.
A	BIA requests that the use of "minimum" results in great uncertainty to builders and developers and should be more specific. That should be noted throughout the ordinance, including; §22.102.080,(3) b.	BIA	Clarified in the Guide with following footnote in Chapter 4 (page 30): "While applicants are encouraged to go beyond the minimum requirement, particularly when sensitive resources are present, and preserve as much of the sensitive resource as feasible, the Department will not require more than 2 to 1 preservation through a ministerial SEA Review."
A.3.b & 4.b	Does this refer to preservation in the same area, or at another location not in a SEA but of a similar type?	Antelope Acres TC	No action. Preservation referred to in the development standards is on-site preservation only.
A.4.b	Any disturbance or destruction of rare plants in any resource category should be avoided, or compensated by the preservation of two times the number of plants to maintain a theoretical "no net loss" per project.	Three Points-Liebre Mountain TC	No action. Rare plants ranked 1, 2 or 3 by CNPS may not be disturbed or destroyed under a Ministerial SEA Review. If disturbance to such plants is unavoidable, the project will go through discretionary review and mitigation ratios will be determined based on Recommended Preservation Ratios for SEA CUPs included in the Chapter 8 in the Guide (page 77). CA Rare Plant Rank 4 plants, which are "watch list" plants of limited distribution, require protection at a 1:1 ratio.
A.4.b	Specify if 10 rare plants may be disturbed or if woody rare plants may be disturbed	Caltrans	No action. You can disturb 10 or less of woody rare plants of SEA Resource Cat 4 and not have to replace or mitigate.

A.5	Section A(5) caps the total amount of SEA resource that can be converted to development ministerially under A(1-4). The limit of 20,000 sq. ft. is a generous allocation that will accommodate large homes, outbuildings, barn, etc., even in rural settings. The term “total building site” is used to describe what counts toward the cap. This is defined in the Definitions sections and differs from the “development footprint” in that some infrastructure and fuel modification are included in the latter but not the former. This again ensures a simple ministerial process for the vast majority of single-family homes on legal lots. The required compensation for impacts is reasonable and consistent with general standards and practice.	EHL	No action.
B	We appreciate the ordinance's setback requirement, but concur with the Endangered Habitats League that it is not sufficient. A minimum of 300 feet should be required.	SCOPE	Added clarifying language to Chapter 4 (page 36) of the Guide that applicants are encouraged to site development as far from water resources as possible. Setbacks range from 100-300 ft depending on the water resource. Any structures requiring fuel modification will also have 200 ft fuel mod zone buffer that cannot enter into water resource setback.
B	<p>We are concerned that that the setback proposed for marshes, seeps, and springs is not adequate for buffering purposes. In our semi-arid climate, the year-round water supplied by marshes, seeps, and springs is of utmost importance for wildlife. It is vital that access and use be unfettered by human disturbance. It is also important that people not be placed in proximity to potentially dangerous species like mountain lions which use these water features. As most if not all marshes, seeps, and springs in our region will be ½-acre or less, the vast majority of these features would only receive 100-ft of setback, which is very small.</p> <p>We recommend 300 feet for all marshes, seeps, and springs. While fuel modifications zones might comprise part of this setback, they are subject to the vagaries of changing fire department regulation. Furthermore, uses within fuel modification zones include human uses, such as stables and animal keeping, that will have adverse inhibitory effects on the wildlife using the water sources. Consultation with state and federal wildlife agencies might be helpful.</p> <p>Also, we strongly concur that, for purposes of setback calculation, fuel modification zones must be included as developed area. These zones are cleared of vegetation to varying extents (often completely cleared), may be planted with non-native vegetation, provide less visual cover for wildlife, and are subject to erosion.</p>	EHL	Added clarifying language to Chapter 4 (page 36) of the Guide that applicants are encouraged to site development as far from water resources as possible. Setbacks range from 100-300 ft depending on the water resource. Any structures requiring fuel modification will also have 200 ft fuel mod zone buffer that cannot enter into water resource setback.
C	BIA suggests removing the fencing standards under “Area-wide Development Standards;” Based on the broad nature of the resources within the County SEAs, a one size standard does not fit all. For this reason, the fencing should be looked at on a case-by-case basis.	BIA	Added additional language to fencing development standard in Section 22.102.090.D in the Ordinance to allow for one impermeable enclosure for the purpose of protecting livestock or companion animals within the development footprint.
C.1 & C.3	We recommend specifically: no chainlink fencing or solid brick walls surrounding the development footprint, unless necessary for retaining walls, in order to maintain scenic resources. Explicitly—no barbed wire.	Three Points-Liebre Mountain TC	No action. Impermeable fencing materials can only be in Building Site Area. Materials for impermeable fencing can be subject to Community Standards District requirements for certain communities.
C.3	Please add woven wire as a prohibited material.	Antelope Acres TC	No action. Net, a similar material, is prohibited.
C.4	Prohibit the use of blue-light emitting diode (LED) type bulbs and fixtures, as lighting the natural environment is quite impactful, as evidenced by studies observing serious harm and changes to animal and insect behavior from nighttime lighting. As indicated in the book Ecological light pollution, Frontiers in Ecology and the Environment, By Dr. Travis Longcore and Catherine Rich, “Light pollution has demonstrable effects on the behavioral and population ecology of organisms in natural settings. . . derived from changes in orientation, disorientation, or misorientation, and attraction or repulsion from the altered light environment, which in turn may affect foraging, reproduction, migration, and communication” (2004). The alteration of the ambient light level at night can result in an otherwise suitable habitat being avoided or unusable. Artificial light in the environment may thus be considered a chronic impairment of habitat.	Three Points-Liebre Mountain TC	No action. Outdoor lighting is already prohibited from being directed onto natural habitat areas and upward into night sky. The Rural Outdoor Lighting District will apply to all SEAs, and has more specific provisions for outdoor lighting. Additional Best Management Practices are included in Chapter 4 in the Guide (pages 40-41).

C.4	<p>In C(4), we strongly agree with the section on Window Reflectivity as far as it goes, but as the text notes, much more can and should be done to prevent deadly and unnecessary collisions of birds with window glass. According to the American Bird Conservancy's "Bird-Friendly Building Design" (enclosed):</p> <p>Under the right conditions, even transparent glass on buildings can form a mirror, reflecting sky, clouds, or nearby habitat attractive to birds. When birds try to fly to the reflected habitat, they hit the glass. Reflected vegetation is the most dangerous, but birds also attempt to fly past reflected buildings or through reflected passage- ways, with fatal results.</p> <p>Additional methods to prevent collisions range from avoiding plantings in front of glass windows to use of UV patterned glass, which is transparent to people but not to birds. If additional measures are not incorporated directly into the ordinance, we recommend inclusion of best management practices into the Implementation Guidelines.</p>	EHL	Added Best Management Practices in Chapter 4 in the Guide (page 40).
C.5	Please add "to use subdued light or red lighting".	Antelope Acres TC	No action. Language is already in Chapter 4 of the Guide (pages 40-41).
C.5	Night lighting/pollution is well documented to have a negative effect on wildlife. In order to avoid night light pollution in the SEAs, the SEA ordinance needs to include conditions and adopt lighting standards that prevent night light pollution to the greatest extent possible and therefore, its impacts to wildlife.	CNPS & CBD	No action. Outdoor lighting is already prohibited from being directed onto natural habitat areas and upward into night sky. The Rural Outdoor Lighting District will apply to all SEAs, and has more specific provisions for outdoor lighting. Additional Best Management Practices are included in Chapter 4 in the Guide (pages 40-41).
C.6	Given the large 200 ft buffer required by LAC Fire for fuel modification and brush clearance, we have concerns that the wildlife could be faced with a virtual desert of plant life that could interfere with connectivity. How can this be remedied through design?	Hills For Everyone	No action. Conservation centered design will cluster buildings which will help to lessen the amount of fuel mod. Please see the graphic in Chapter 4 of the Guide that shows an example of conservation subdivision.
C.7	The list of landscaping plants to be avoided should include the species listed by the California Invasive Plant Council (Cal-IPC) Inventory. The invasive plant list maintained by the County Planning Department should be routinely updated to reflect the Cal-IPC Inventory. The list should also include plants locally and regionally identified as invasive, but not listed by Cal-IPC. Additionally, the ordinance should emphasize the use of locally-appropriate native plant species in new landscaping.	CNPS & CBD	Added to Landscaping Development Standard in the Ordinance that requires planting of natives in Fuel Mod Zone C. Invasive plant list already states the CAL IPC list is prohibited.
C.7	the list of landscaping plants to be avoided should include invasive species listed by the California Invasive Plant Council (CALIPC). In addition, we note that the invasive plant list maintained by the Department of Planning could be more complete. One example (and there are probably others) is the trumpet vine that grows rampant in the Arroyo and Foothills Conservancy SEA. This plant needs to be listed as invasive in this area. We also suggest that new trees for landscaping purposes should be native species appropriate to the local climate.	CNPS SG Mountains	No action. Need more information. No scientific name provided and no trumpet vines found in CAL-IPC.
D.1	We are concerned that the section describing permissible crops is too limited to non-invasive species. Most crops are invasive when water is available.	BIA	No action. Species in Appendix C in the Guide (page 108) are not allowed as crops in the SEAs. Most species in the list are not crop species.
D.2	Because conservation easements run with the property title, which helps to guarantee that the set asides will remain in perpetuity, we fail to understand why the County prioritizes a covenant between the County and the land owner (d.) over a conservation easement (e.). Please provide the justification for the County's preference for the required open space preservation method.	CNPS & CBD	Switched order as suggested in the Ordinance.
D.2.a.i	Does "disturbed area" include second growth" or the desert that is recovering from past farming, grazing, fires, etc.?	Antelope Acres TC	Added early successional to SEA Cat 5 definition in the Ordinance. An area recovering from disturbance that is identifiable as a natural community (vegetation alliance or association) per the Online Manual of California Vegetation, will be classified and protected based on its state ranking. An area that is still in the very early stages of recovery that cannot be categorized as a natural community would be considered SEA Resource Category 5. Even in these areas, however, if it is shown through the BCM that a special status/rare/sensitive species is using that area, then the area in use by that species will be protected under the appropriate category for that species (i.e. burrowing owls are SEA Resource Cat 2).

D.2.b & D.2.c	Stabilization and restoration of the site should be done as soon as possible, rather than 90 days to one year, to prevent the establishment of invasive plant species in SEAs. We have witnessed immediate conversion of cleared soil to fields of ragweed, fiddleneck, and russian thistle. The only way to prevent the spread of noxious and invasive plants is to immediately replace with locally indigenous species, monitor and encourage success with hand weeding—no herbicides.	Three Points-Liebre Mountain TC	No action. The Ordinance already says testing areas must be seeded with local indigenous plants within 90 days. Language was added to the Guide to say stabilization activities should take place "as soon as possible".
D.2.c	This section and the three points under the subsection do not appear to be necessary, because of the language above this section under (D) 2. (b), requiring exploratory testing stabilization.	BIA	Added language in the Ordinance in Section 22.102.090.E.2.a.iv that requires a Restoration Plan at the time of the application submittal for exploratory testing. Temporary stabilization of areas disturbed by exploratory testing is not sufficient in all cases. While true that in less disturbed sites, native vegetation may quickly grow back, in more disturbed sites where root stock is destroyed and soil heavily disturbed, a more targeted restoration approach will be needed to return the area to a natural state. Definition of Restoration Plan can be found in Section 22.102.020.BB.
D.3	The Draft Ordinance appears to require a minimum of 75% open space for all subdivisions regardless of what category of resources are on the property [page 22]. It also appears that the subsequent residential development of each lot created by the subdivision is subject to additional "on-site" preservation requirements as high as 66% (or 2:1) according to page 60 of the "Guidelines". Is this correct? If so, has the County prepared any sort of analysis showing that, to achieve the resource protection policies set forth in adopted planning documents, it is necessary to first set aside 75% of every subdivision project as "preservation land" and then set aside an additional 66% of every parcel created therefrom when it is developed for residential purposes? More importantly, has the County concluded that adopted resource planning policies will not be achieved unless these large land areas are taken for "preservation" purposes? If the County has developed such an assessment, the Acton Town Council respectfully requests that a copy of this assessment be provided.	Acton TC	No action. The process for subdivisions is not changing but the Ordinance gives a ministerial review option for potential subdivisions that can meet all development standards. Subdivisions may be required to mitigate impacts beyond the 75% initial preservation of open space through a SEA CUP.
D.3	Land Divisions should be discouraged in SEAs. The project site in total, not confined to twenty-five percent, and open space preservation should be evaluated for impacts from pets, inappropriate off-road use, trash, potential for human/wildlife interaction, watershed pollution from herbicides, insecticides, and rodenticides; infringement of prohibited lighting; loss of wildlife sensitive to human presence. Edge effects will contribute to loss of sensitive habitats preserved on site, and reduce the actual amount of 75 percent preservation of natural space. More mitigation might be necessary. Any project unable to meet SEA Development Standards	Three Points-Liebre Mountain TC	No action.
D.3	In D(3), the open space standard for land divisions—75% minimum open space and corresponding maximum 25% development footprint—is the cornerstone of this ordinance. It is also essential to comply with the General Plan’s strong policies for resource avoidance and contiguous open space within SEAs. <sup>3</sup> While we would ideally recommend a greater set aside of SEA land during subdivision, EHL nevertheless supports the proposal as a reasonable balance. <sup>4</sup> We note that greater open space than the minimum will often be feasible, even if lots are rural in nature.  However, terminology should be consistent and clear, so that it will not be subject to dispute. Terms formally defined in the Definitions section should be used. We recommend this edit: D(3) Land Divisions. Land divisions shall not exceed a maximum <del>disturbed developed area</del> development footprint of 25 percent of the project site.	EHL	Revisions made to Section 22.102.090.E.3. Language was updated in the Guide and included a graphic demonstrating Conservation Subdivisions in Chapter 4 (page 46).
D.4	Who are the developers and what are the names of their corporations that have “reasonable potential for future development” of large parcel maps? How big are these and what is the criteria for “reasonable”?	Antelope Acres TC	No action. Information requested is not available.
D.4	Clarification is needed on the responsible party to whom the parcel map's development potential should be demonstrated. NPS suggests adding language to clarify that developability be confirmed through recordation of large lot parcel maps.	NPS	No action. The development standard is requiring that the <u>potential</u> for development that meets the requirements for Ministerial SEA Review exists on each created parcel. This is further explained in the Guide in Chapter 4 (page 47).
D.4	Conservation dedication is suggested, but no mention is made of management funding for either large lot parcels or other larger areas where open space is dedicated. Where does management funding come from? Who manages the funds? Who manages the property? Are they qualified?		No action. Funding and management of dedicated open space will be negotiated by the applicant with the land trust, gov body, etc that takes responsibility for the land.

	<p>EHL is greatly concerned over the Large Lot Parcel Maps provision, D(4). While D(3) is clear that all subdivisions must comply with the requirement for a minimum 75% of properly configured open space, D(4) interjects a different and vague standard of review for some subdivisions, that of “reasonable potential.” The danger is that if contiguous open space is not captured through clustered site design at the outset, the basic goal of the ordinance—achieving SEA resource protection as development occurs is irretrievably lost. Instead, there would be a checkerboard of legal lots regularly spaced over the landscape, creating maximal habitat fragmentation.</p> <p>We agree with the underlying intent of D(4), that is, to ensure that when parcels are created prior to detailed site planning, the resultant development will still be able to meet all the SEA Development Standards. The Implementation Guide provides steps for meeting setback and habitat preservation ratio requirements under this circumstance. For compliance with D(3), open space configuration can, for example, be achieved with creation of one or more dedicated open space lots or via “pie shaped” lots with development at a common apex. We suggest the following clarification so that there is, on the one hand, definitive compliance for Large Lot Parcel Maps, and on the other hand, greater certainty that landowners applying for subsequent development will not encounter problems.</p> <p>D(4) Large Lot Parcel Map. If large lot parcel maps for sale, lease, finance, or transfer purposes, or other subdivisions are not required to specify the location of development, the subdivision shall not be approved unless it can comply with all provisions of demonstrate that all resulting parcels have reasonable potential for future development that meets the standards for SEA Review per 22.102.080 (SEA Development Standards), (e.g., adequate areas of SEA Resource Categories 4 and/or 5, setback from water resources, land division open space).</p>	EHL	Revisions made to Section 22.102.090.E.3. Language was updated in the Guide and included a graphic demonstrating Conservation Subdivisions in Chapter 4 (page 46).
<b>22.102.090 (Open Space) in Public REVIEW Draft (March 2018)</b>			
	Add (C) 7. We would like to add point 7. under exemptions to Open Space Use in subsection (C), to read: “7. Trails and/or other recreational amenities”	BIA	No action. Trails are considered in Section 22.102.100.C.3. Recreational amenities should be site outside of preserved open space areas.
	<p>Section 22.102.090 describes how the Ordinance proposes to address impacts to biological resources within the SEAs and states. “This Section sets forth the preservation and recordation requirements for open space when required by this Chapter, either in compliance with Section 22.102.080 (SEA Development Standards) or to offset impacts to SEA Resources through a SEA CUP.”</p> <p>CDFW generally concurs that the Open Space and SEA Development Standards described in the Ordinance furthers biological resource preservation and protection within the SEAs.</p> <p>Understanding that resource value and sensitivity may vary depending on the location and type of project, CDFW may permit activities in SEAs within CDFW’s regulatory authority that may be subject to more stringent avoidance, mitigation ratio, preservation dedication, and conservation management standard conditions than described in the Ordinance.</p> <p>CDFW recommends that the Ordinance avoid using the term “open space” and replace it with the term “natural open space”. CDFW does not generally support the use of open space preservation to mitigate for impacts to biological resources. Open space may be interpreted as an area that could be used for recreational activities such as sports fields, golf courses, etc. that generally are not compatible with maintaining native biological diversity.</p>	CDFW	Changed all "open space" to "natural open space" in the Ordinance and Guide.
	<p>We were puzzled that language about off-site mitigation was removed in this last draft. While recommend this language be reincorporated, we also recommend setting criteria governing when substitution of off-site for on-site is appropriate. The suggested edits below are based on the last ordinance draft:</p> <p>Natural open space shall be preserved on the project site. If on-site open space is not feasible, or such on-site open space would be too small and/or isolated to retain long-term biological value, an off-site location may be used provided it is recommended by the Director and County Biologist</p>	EHL	No action. This information in the Guide. For Ministerial SEA Review, since it is not a discretionary process, the natural open space has to be in-kind habitat provided onsite. If in-kind habitat cannot be provided onsite, the biologist will need the discretion to determine whether the off-site preservation proposed off-site is adequate with a SEA CUP.

			No action. The 75% required natural open space, configuration requirements, and additional development standards are designed to ensure that wildlife movement is not impacted by land divisions. If the subdivision cannot meet these requirements, it will need to do additional biological studies, CEQA analysis, SEATAC review, and Public Hearing. Through this discretionary process, impacts to wildlife corridors will be thoroughly evaluated and mitigation will be integrated into the project.
A.3	How do wildlife corridors fit into land division? Are they left untouched, re-routed or eliminated?	Antelope Acres TC	
A.3	we strongly support the land division project requirement that 75% of the developed area is to be preserved as open space.	CNPS SG Mountains	No action.
A.3	In Open Space A(3), the meaning of the term "net" is unclear. We suggest this edit: A(3) For land division projects, at least 75 percent of the net area of the development site <b>original undivided parcels</b> shall be provided as required preserved open space.	EHL	Changed the language in the Ordinance and Guide per comment.
A.4	BIA suggests that this provision is removed because Opens Space could be set aside in the Final Map process.	BIA	No action. Projects subject to the SEA Ordinance will be required to record open space preservation prior to grading, removal of vegetation, or occupancy.
B.1	How would multiple noncontiguous areas of open space not result in or not be considered fragmentation?	Antelope Acres TC	No action. Please refer to Chapter 8 in the Guide (page 77) for an explanation of when multiple noncontiguous areas of open space may be preferable.
B.1	Please remove "feasible" words, since they allow for too much opportunity for judgment on what might be allowable, but not preservative of the SEA. In what instance would the County Biologist determine that multiple, non-contiguous areas of open space is an environmentally superior configuration?	Three Points-Liebre Mountain TC	No action. Since the open space configurations are for a discretionary SEA CUP, it will be looked at on a case by case basis. Please refer to Chapter 8 in the Guide (page 77) for more information.
B.2	Preserved open space areas should be contiguous with natural open space areas on adjoining lots or parcels, period. To do otherwise will contribute to habitat fragmentation, possibly interrupt wildlife passage in corridors or movement areas, which the IG professes to preserve and protect.	Three Points-Liebre Mountain TC	No action. Since the open space configurations are for a discretionary SEA CUP, it will be looked at on a case by case basis. Please refer to Chapter 8 in the Guide (page 77) for more information.
B.3	Additional mitigation should be required when roads, streets, highways, driveways are placed in open space or conservation areas.	Three Points-Liebre Mountain TC	No action. Roads, streets, highways, driveways that are placed in preserved natural open space will not count towards the required amount of preserved natural open space. Also, roads, streets, etc. shall not be placed unless a decision maker finds that it is necessary for circulation or access. Since these cases are discretionary cases, it will be looked at on a case by case basis. Roads will only be allowed if it is most protective and sensitive design.
B.3	We generally concur with the language for configuration as contained in this section, but B(3) is missing the key component of feasibility when siting infrastructure. Streets and other access should only go through natural open space when otherwise infeasible. An edit is proposed:  B(3) Driveways, streets, roads and highways may be placed within the natural open space area if the Regional Planning Commission or Hearing Officer finds that <b>placement elsewhere would be infeasible and</b> they are necessary to ensure adequate circulation or access. Such driveways, streets, roads and highways shall not be counted as a portion of the total required natural open space provided. These areas shall include any necessary wildlife crossings and/or other features necessary to avoid biological impacts.	EHL	No action. Language in the Ordinance was revised by staff for clarification.
C	Would emergency situations qualify as an exception?	Caltrans	Review of emergency and hazard management activities is address in the Guide in Chapter 10 (page 84).

C.6	The SEA Ordinance should positively determine what is appropriate in disturbance of open space. The term “Activities” is a rather broad term and items should be listed specifically for understanding whether they are beneficial in maintaining habitat conditions. As we commented previously, grazing and agricultural activities should require a discretionary permit that includes monitoring to assess the success of maintaining habitat conditions, and to periodically determine whether cessation of listed or approved activities are needed to preserve the biological resources on the site.	Three Points-Liebre Mountain TC	Added clarifying language in the Ordinance.
D.1	What is the difference between a deed restriction and a covenant?	Antelope Acres TC	No action. A deed restriction is a land use restriction added to the title of a property. A covenant is a formal agreement or contract between the county and property owner, providing and recording an open space restriction over an area of land. Please see Chapter 8 in the Guide (page 78) for more information.
D.1 & D.2.d	BIA requests clarifications to expand the term “property owner” to include a “Property Owners Association.”	BIA	No action.
D.2	Who is it that decides which open space preservation mechanism is implemented for development that does not comply with SEA Development Standards? There are seven choices listed by preference. Is a choice selected at random or by request of the developer?	Antelope Acres TC	No action. The mechanism is ranked by the preference of the County. The applicant will have to prove that the higher ranked mechanism is infeasible.
D.2	Who determines what type of dedication is suitable? This section lists those in order of County preference. Our guess is project proponents will chose the least desirable—g. In-lieu fees. Please provide more detail for determining the type of preservation. We would like to add that dedication as part of development mitigation should remain in the SEA where the development occurs, and provide, at minimum, replacement of similar habitat twice that of the development's disturbed area, or what is determined in the IG according to habitat type and value. Otherwise, loss is maintained at fifty percent.	Three Points-Liebre Mountain TC	No action. The mechanism is ranked by the preference of the County. The applicant will have to prove that the higher ranked mechanism is infeasible. Off site open space preservation will need to occur in or contiguous with the same SEA to make sure that similar habitat types are preserved.
D.2	<p>The new SEA ordinance would allow offsets and in lieu fees for impacts to a SEA. This could allow for destruction to an SEA with funds or conservation easements in a mitigation bank in some entirely different location outside our Valley. This situation has already in City of Santa Clarita permitting. Re-establishment of a species in a new location may not be possible due to the particular needs of an ecological community. Creating a new place for the species may seem like an easy matter, but often results in a failure of the species to thrive in the new location.</p> <p>To our knowledge, offsite offsets and mitigation banks were not allowed in the previous SEA ordinance. Mitigation in far away locations frustrates efforts to reduce fragmentation, a goal described in the Implementation Guide under the goals section. Offsetting and in lieu fees that will not accomplish this goal, should not be permitted. If the continued existence of our SEAs is really to be accomplished, offsite mitigation must not be allowed or kept to an extreme minimum.</p>	SCOPE	Added language to Section 22.102.100.D.2 to clarify that required open space preservation will need to occur within or contiguous to the same SEA to make sure that similar habitat types are preserved. In-lieu fees are the last of County preferences. The applicant will need to prove that the 6 previous mechanisms are infeasible for the project. Mitigation banks and offsite offsets will need to occur within or contiguous with the same SEA.
D.2	Mitigation and conservation banks and offsite mitigation preserves could provide a balance between responsible development and permanently conserving important private properties within SEA boundaries. A streamlined and predictable offsite compensatory mitigation program can be of benefit to public and private developers while incentivizing the protection and management the most critically important areas within SEA boundaries. Wildlands would welcome the opportunity to work with the County on developing offsite compensatory solutions provided there is acknowledgement through the SEA Ordinance that banks and other forms off offsite mitigation provide a preferred method for mitigating impacts. Perhaps the County should consider a pilot program within a SEA where impacts are readily occurring. In order to incentivize the development of offsite compensatory solutions like mitigation or conservation banks or other large private lands acquisitions, the County should consider revising 22.102.090 Section D, Paragraph 2 to prioritize Conservation or Mitigation Banks higher in order of preference. The County could also expand and revise the preference to “Conservation or Mitigation Bank and other private lands acquisitions within an SEA boundary.	Wildlands	Changed the order of the preferred mechanisms. Moved Conservation or Mitigation Banks to #2.
D.2	recommends that the open space dedication order be revised to address 2.a (non-profit orgs) and 2.b (govt entities) with equal priority. Additionally, the text may suggest the conveyance to a public park or open space management agency with the govt entity category (2b)	NPS	Changed the order of the preferred mechanisms. Open space dedication to non-profit organizations and government entities were given equal priority.

D.2	offsets and in lieu fees could allow for destruction to an SEA with funds or conservation easements in some entirely different location. To our knowledge, offsets were not allowed in the previous SEA ordinance. California has already lost 90 percent of its native wetland and river habitats, leading to the precipitous decline of native plants and animals. We suggest that if it is really the County's intention to reduce fragmentation as described in the Implementation Guide under the goals section, offsetting and in lieu fees will not accomplish this goal, but instead result in even worse fragmentation. Also, speciation may result in a particular plant or animal species thriving in very site specific locations with explicit soil, sunlight, and water needs. Creating or locating an adequate replacement may seem easy, but often results in a failure of the species to thrive in the new location. If the County continues to include this new option, we ask that very strict rules be placed on its use and that it be only a last resort in the planning process.	Friends of Santa Clara River	No action. In-lieu fees are the last of County preferences. The applicant will need to prove that the 6 previous mechanisms are infeasible for the project. Mitigation banks and offsite offsets will need to occur within or contiguous with the same SEA.
D.2	No mention is made of management funding for either large lot parcels or other larger open space areas. Where does management funding come from? Who manages the funds? Who manages the property? Are they qualified to protect the SEA resources?	Hills For Everyone	No action. Funding for open space management must be negotiated between the applicant and entity they are dedicating the land to or the easement holder. In the case of privately retained open space (on-site deed restrictions) required for Ministerial SEA Review, the landowner will be responsible for ensuring the open space is kept in its natural undeveloped condition.
D.2.g	Specify "conservation" in-lieu fees as referenced in Definition G	Caltrans	Made suggested change.
<b>22.102.100 (Findings) in Public REVIEW Draft (March 2018)</b>			
A	BIA believes that the language under subsection A. be amended to eliminate any potential misinterpretations under current language. We recommend the section to be revised to read: "A. To the extent feasible, the proposed development minimizes potential impacts to identified biological resources present on the portions of the proposed development site that are located within the SEA from incompatible development through the application of environmentally sensitive site design practices and development standards."	BIA	No action. Please refer to Chapter 5 in the Guide (page 58) that provides guidance on how to evaluate a project's ability to meet findings.
B	Also, to eliminate any misinterpretations, and conflicting exemptions, BIA suggests the language under subsection B. be replaced with the following: "B. Potential conflicts between conservation of the resources in SEAs (as identified in the County's General Plan) and the proposed development have been equitably resolved."	BIA	No action. Please refer to Chapter 5 in the Guide (page 58) that provides guidance on how to evaluate a project's ability to meet findings.
C	Please specify the sensitive design features that would be sufficient for habitat. (Give examples.)	Antelope Acres TC	No action. Please refer to Chapter 5 in the Guide (page 58) that provides guidance on how to evaluate a project's ability to meet findings.
D	What are the acceptable or foreseeable ways of maintaining natural functions? Are there allowable alterations of water bodies, watercourses and tributaries? How would this be done?	Antelope Acres TC	No action. Please refer to Chapter 5 in the Guide (page 58) that provides guidance on how to evaluate a project's ability to meet findings.
F	To create consistency across this "Findings" section, based on the earlier replacement language suggested above, (F) should be amended to read: "F. The proposed development does not have the potential to result in the loss of resiliency of the SEA, to the extent feasible."	BIA	No action. Please refer to Chapter 5 in the Guide (page 58) that provides guidance on how to evaluate a project's ability to meet findings.
F	Several of the findings have been improved. However, we remain opposed to the findings in section (F). This is because unacceptable harm that comprises the purpose of the ordinance may occur far short of the extreme circumstances listed. As written, these catastrophic situations read not as examples, but rather as fixed thresholds. We suggest the following edits:  F. The proposed development promotes the resiliency of the SEA to the greatest extent possible. For purposes of this finding, SEA resiliency cannot be preserved when the proposed development may cause any of the following: 1. Significant unmitigated loss of contiguity or connectivity Bisection of the SEA. 2. Significant unmitigated impact to Removal of the only known location of a Priority Biological Resource; 3. Removal of habitat that is the only known location of a new or rediscovered species; or 4. Other factors as identified by SEATAC.	EHL	Changes made per comment.

F.4	This language is incredibly broad, and could pose unforeseen restrictions and challenges on builders and developers.	BIA	No action. Since SEATAC makes recommendations to the Regional Planning Commission, it will be up to the Commission's discretion to determine if this Finding has been met or not.
<b>22.102.110 (Filing Fees) in Public REVIEW Draft (March 2018)</b>			
A.5.b	Under current language, the SEATAC review fee only covers up to three SEATAC meetings, and would require new fee for additional meetings. BIA believes that this language should be amended to read:  "b. The SEATAC Review Fee shall cover all SEATAC meetings."	BIA	No action. With the streamlined process and pre-application counseling (SEA Counseling and Biological Constraints Map) the number of SEATAC meetings per project may lessen as better designed projects will be heard by SEATAC.
<b>22.102.120 (Review Procedures for County Projects) in Public REVIEW Draft (March 2018)</b>			
	We would like to reiterate our position that essential public service facilities which are required to go through a CEQA process and permitting through natural resource agencies be included in a SEA review process similar to the "County Projects" process in §22.1 02.120 of the SEA Ordinance Update - Public Review Draft and Chapter 9 of the SEA Ordinance Implementation Guide - Public Review Draft.	Sanitation Districts	No action. New developments proposed by natural resource agencies will be subject to the SEA Ordinance and review processes. Existing projects and phases that have undergone CEQA review do not need SEA Review unless revisions outside of the original project scope is proposed.
<b>22.102.130 (Review Procedures for Habitat Restoration Projects) in Public REVIEW Draft (March 2018)</b>			
A.2	Include a plant palette as information required	Caltrans	Added language per comment.
<b>22.102.140 (SEATAC) in Public REVIEW Draft (March 2018)</b>			
<b>Appendix in Public REVIEW Draft (March 2018)</b>			
	Our only specific comment at this time is our concern that the SEA Preservation Ratios were removed from the Appendix. Although we understand there needs to be some level of flexibility, we believe at least a minimum ratio be established to prevent miss-use of this provision, which can occur many times over the years, resulting in additive reduction of habitat protection.	Donna Chen	No action. A recommended minimum preservation ratios for SEA CUPs are included in Chapter 8 in the Guide (page 77). The ratios are provided as a starting point since with a discretionary permit, the ratios can be changed based on site specific factors and SEATAC recommendations, to the satisfaction of the Hearing Officer or Commission.
<b>Procedural/General</b>			
Conceptual SEAs	adopt conceptual SEAs.	B. Peterson, D. Madsen, E. Eichinger, J Thomas, J. Byrne, L. Baldwin, M. Seidler, M. Strehlow, M. Paulson, P. Byrne, R. Baer, R. Kikuchi, R. Reynolds, T. Wang, W. Kamen, N. Staddon, D. Louis, N. & H. Applebaum, D. Shea, G. Walter, B. Perry, Wanda Shimazu, Celia Kutcher, Sierra Club, Sierra Club-SGV, Sierra Club-Diamond Bar, HHIA, M. Hughes	The Conceptual SEA Update has been added to the project description to officially designate Conceptual SEAs as official SEAs and subject to the SEA Ordinance.
Conceptual SEAs	All protections offered in the new ordinances must apply to all developments in areas near existing Conceptual SEAs and any boundary expansions, which may be implemented in the final ordinance update.	Sierra Club-Diamond Bar, Hills For Everyone, HHIA	The Conceptual SEA Update has been added to the project description to officially designate Conceptual SEAs as official SEAs and subject to the SEA Ordinance.
Conceptual SEAs	Consider having this proposed SEA Ord apply to conceptual as well as adopted SEAs. Waiting for the adoption of the ESGVAP may unnecessarily delay implementation of the Draft Ord enhanced protections for SEAs and expose them to harmful developments.	Puente Hills Habitat Authority	The Conceptual SEA Update has been added to the project description to officially designate Conceptual SEAs as official SEAs and subject to the SEA Ordinance.
CSDs	Rural areas should be allowed to utilize CSDs to protect environmentally sensitive areas from development, including SFRs.	Leona Valley TC	No action. Please consult with the Community Studies North section to see if CSDs can accommodate the request.
Enforcement	Include penalties for destruction of natural habitat which have occurred prior to permit process, in an effort to dissuade such activities. Anything less in the codified process appears to be in violation of CEQA and NEPA.	Leona Valley TC	Added new section in the Ordinance pertaining to Enforcement. Please refer to Section 22.102.110.
Enforcement	We suggest that the guidelines designate the County biologist or other staff to make at least annual reviews of SEA project conditions to ensure that they are followed. Or, in the alternative, perhaps a community panel with the oversight of SEA TAC could be designated to provide this service. A means of providing long-term enforcement and identifying responsible parties should also be outlined.	SCOPE	Added new section in the Ordinance pertaining to Enforcement. Please refer to Section 22.102.110.

<b>Enforcement</b>	We thank you for your continued concern for the environment and ask that funds be allocated in continued monitoring of any illegal and unwanted developments in the hills of Rowland Heights. We are relying on you to keep our neighborhood hills stay the way they are.	Randy and Louella Roberson	Added new section in the Ordinance pertaining to Enforcement. Please refer to Section 22.102.110.
<b>Reclamation Plans</b>	Indicate surface mining permits would require a conditional use permit, as well as a Reclamation Plan, with the opportunity for public review. We do not approve of surface mining in SEAs, in general, and find the notion incompatible with the purpose of preserving SEAs.	Three Points-Liebre Mountain TC	No action. Surface Mining projects will almost always require a SEA CUP due to the nature of the project with large amounts of vegetation removal. Reclamation Plans are required for Surface Mining Permits.
<b>Public Noticing</b>	Public Notice should be required whenever a proposal will impact an SEA.	SCOPE	SEA CUPs, a discretionary review, will require public noticing for the public hearing. For Ministerial SEA Review, there will not be public noticing since it is a ministerial review. By going through the Ministerial SEA Review process, it would mean that the County Biologist confirmed that the development was able to meet development standards proposed in this Ordinance.
<b>Public Noticing</b>	Public notice should be required for any project proposed in an SEA. For small projects, perhaps this requirement could be addressed by merely posting the project notice on line. An EIR should be required for any large project in a SEA. We understand that the County wishes to streamline small project approvals and make others less onerous. However, public oversight can only occur if the public is able to inform itself of the issues. SEAs are such an important and precious resource to the people of the County of Los Angeles, as they have been such the public took it upon itself to request protection of these resources in the late 1970s and early 1980s. It is important that we have a means of knowing how and when they may be impacted, as has been the case under the old ordinance. We ask that the County find a means of ensuring that the public will be notified of development proposals within SEAs.	Friends of Santa Clara River	SEA CUPs, a discretionary review, will require public noticing for the public hearing. For Ministerial SEA Review, there will not be public noticing since it is a ministerial review. By going through the Ministerial SEA Review process, it would mean that the County Biologist confirmed that the development was able to meet development standards proposed in this Ordinance.
<b>Long Term Protections</b>	We are deeply concerned about current and future protections of SEAs from encroachment induced by a growing populace, continued sprawl from the incorporation of new cities, ranchette and planned community development. The current Ordinance and Implementation Guide should be amended to address these matters, as there needs to be consistent protocols put in place for the ongoing protection of the SEA areas in both documents. Relevant examples that speak to this necessity include:  <input type="checkbox"/> The City of Agoura Hills elected to abandon SEA protections within its jurisdiction after incorporation in 1982. A large area of the former SEA, which remains relatively undisturbed and replete with the unique biological resources. This area is slated to be soon developed into an urban-style large commercial and multi-use area. We believe there are multiple ways the County can implement land use protections that will transfer when unincorporated lands otherwise ceded to a municipal authority.  <input type="checkbox"/> Rural lands throughout the county are increasingly being purchased for creation of ranchettes, second homes, or rentals. The Liebre Mountains serve as an example of this syndrome. SEA protections must be added to the Ordinance and Implementation Guide to address the cumulative effects to biological resources.  <input type="checkbox"/> The proposed Centennial Specific Plan is an example of how a large and very important SEA was abandoned for an enormous planned community. We believe this happened in part due to lack of protocol, policy, planning in favor of large scale development. The repercussions of this failure may be widespread throughout Los Angeles County and adjacent bio-regions and counties.	CNPS & CBD	No action. The proposed Ordinance is the first update since the current Ordinance was adopted in 1982 and is much more protective of the SEAs.
<b>Long Term Protections</b>	We ask that Conceptual SEAs recognize plant alliances: oak woodland, riparian, oak savannah, coastal scrub and soft chaparral habitats be recognized as, not merely islands, but their components as a source for restoration.	Sierra Club-Diamond Bar	No action. The Conceptual SEA Update will only update the designation of the Conceptual SEAs, making it subject to the SEA Ordinance. SEA Protected Trees and Restoration sections were added to the Ordinance and Guide. Please refer to Chapters 3 and 7 in the Guide.
<b>Long Term Protections</b>	request the remnants of smaller natural open space present in the foothills of east Los Angeles County be considered for preservation and/or enhanced to support watersheds and create habitat connectivity to larger parcels.	Sierra Club-Diamond Bar	No action. This project is not proposing changes to the SEA boundaries.
<b>Long Term Protections</b>	Sag ponds are dry due to drought and have limited the nesting and feeding areas. Concerned about endangered species, such as the condor, pond turtles, salamanders and special endangered flora and fauna will be at an even greater risk of extinction. How are the SEAs going to mitigate these problems?	Rose Bryan	No action. The SEA Ordinance focuses on the protection of habitat and natural communities that support these individual species.
<b>Long Term Protections</b>	Centennial should be bought and preserved by the State of CA and added to the state park system or preserved by LA County.	Rose Bryan	No action. Not part of project scope.

<b>Long Term Protections</b>	Our citizens are mostly just concerned about any further developments that will allowed if any. The way it was explained to us, it sounds like it is restrictive and will make it difficult for any big development to be done in the hills.	Louella Roberson	No action. The proposed Ordinance is the first update since the current Ordinance was adopted in 1982 and is much more protective of the SEAs.
<b>SEA Boundary Map</b>	add a symbol into the legend to identify the dashed green line as the Angeles National Forest boundary. Add the SMMNRA boundary line to the map and legend and item description in the legend to identify both federally designated boundaries.	NPS	Requested change will be made through the Conceptual SEA Update, when the SEA and Coastal Resource Areas Policy Map is updated.
<b>SEA Boundary Map</b>	consider establishment of an SEA that would extend from the base of the San Gabriel Mountains along the Rio Hondo and San Gabriel River to Whittier Narrows that includes areas originally considered for inclusion in the proposed National Recreational Area in the National Parks Feasibility study. This would create a wildlife a corridor from the mountains to Whittier Narrows and then into the Puente-Chino Hills.	Sierra Club-SGV, Sierra Club-Diamond Bar	No action. This project is not proposing changes to the SEA boundaries.
<b>SEA Boundary Map</b>	Exclusion of EOAs from the SEAO that lie within SEAs in the AV, or were excised from SEAs by the BOS Motion, appear antithetical to the purpose of preservation of biodiversity, prevention of fragmentation of conservation lands, and wildlife movement areas. It leads one to question the uneven implementation of the intent and purpose of drafting the SEAO, when the Antelope Valley Area Plan exclusively favors commercial development in various and remote reaches of the Antelope Valley. The proximity of EOAs directly adjacent to SEAs will undoubtedly have spillover or sprawl effects. Such an action giving carte blanche to intensive commercial development, which bears repeating, is in conflict with the stated principles outlined in the IG and the intent of the ordinance (IG 4).	Transition Habitat Conservancy	No action. This project is not proposing changes to the SEA boundaries.
<b>Cumulative Impacts</b>	the cumulative impacts of concurrent multiple projects in local SEAs must be also be considered as part of the SEA approval process.	Sierra Club-SGV, HHIA	No action. Please see Chapter 9 in the Guide for more information on how the Department will track development and conservation in SEAs to evaluate cumulative impacts.
<b>Cumulative Impacts</b>	We observe the cumulative impacts of concurrent, multiple development projects in local SEAs, and request they also be considered part of the SEA approval process.	Sierra Club-Diamond Bar	No action. Please see Chapter 9 in the Guide for more information on how the Department will track development and conservation in SEAs to evaluate cumulative impacts.
<b>Cumulative Impacts</b>	We would like any proposed development be reviewed with a fine tooth comb for any adverse effect on traffic, natural fauna and wildlife especially. We are opposed to any further real estate development that will add to the traffic and population explosion that plagues our community.	Randy and Louella Roberson	No action. Please see Chapter 9 in the Guide for more information on how the Department will track development and conservation in SEAs to evaluate cumulative impacts.
<b>Cumulative Impacts</b>	as you heard last night many of our neighbors are concerned with creeping development. It begins with a new house, then a school or church, then an apparently benign golf course. Bit by bit we lose our functioning wilderness. There must be a measure for any project and its cumulative impact on our biologically significant open space. Every project must be measured not just by its individual impacts but by the cumulative impacts of all projects in and near our precious SEA wilderness. These projects may bring mandated mitigation, but 10 acres of newly created oak woodland does not mitigate for the loss of 5 acres of old growth oak woodland. And as you heard last night there are many in our community that just love our old oak trees.	Mike Hughes	No action. Please see Chapter 9 in the Guide for more information on how the Department will track development and conservation in SEAs to evaluate cumulative impacts.
<b>Cumulative Impacts</b>	We have enough housing around Chino Hills and Diamond Bar Communities. Pollution, crimes, traffic jams and wild life conservation become serious concerns. Please expand housing projects towards east along HW60.	Tom Shiah	No action. Please see Chapter 9 in the Guide for more information on how the Department will track development and conservation in SEAs to evaluate cumulative impacts.
<b>Cumulative Impacts</b>	Concerned about the freeway that will replace the 138 being proposed from interstate 5 to the 14. appears to be devastating to the flora and fauna of AV. I have seen many large animals, such as mountain lions, deer, bears, etc. being killed by cars and trucks traversing the mountain ranges. how are the SEA going to mitigate this proposal?	Rose Bryan	No action. Please see Chapter 9 in the Guide for more information on how the Department will track development and conservation in SEAs to evaluate cumulative impacts.
<b>Cultural Resources</b>	I also think Cultural Sensitivity to the Indians should be considered as well before allowing this land to be developed.	Jacqueline Bennett	No action. Projects that require an Initial Study to assess environmental impacts per CEQA will be required to consult with local Native American tribes to assess impacts to cultural resources. SEA CUPs or Ministerial SEA Reviews that require a discretionary Use permit may go through this process, depending on the CEQA determination.
<b>Observations</b>	Recent observations of California Gnatcatcher, San Gabriel snail, and one of two (L.A. County) relict populations of gray squirrel habitat have been mapped in City of Diamond Bar wildlands. These areas border SEA 15, Upper Tonner Canyon/Tres Hermanos Ranch and Rowland Heights (Aera property.) Diamond Bar also has critical wetlands traversing the city, which support and affect wildlife movement, related to SEAs and unprotected natural open space on its borders. SEA 15 is a particular concern.	Sierra Club-Diamond Bar	SEA 15, Puente Hills SEA, is part of the proposed Conceptual SEA Update that official designates the conceptual SEA as an official SEA subject to the Ordinance.

<b>Observations</b>	Due to many recent findings of sensitive flora/fauna species and the new watershed sciences, we ask all projects be upgraded to require protocol environmental surveys via the updated CalVEG, habitat recognition system:	Sierra Club-Diamond Bar	No action. Determination of natural communities present on the project site will be based on the Online Manual of California Vegetation, which is the California equivalent to CalVEG.
<b>Water Sources</b>	When any development within a SEA is being considered, the SEA biological review should: a) identify the water source for that project; b) ensure that water needs for the project have a sustainable yield and do not cause undesirable results; and, c) groundwater dependent ecosystems and associated beneficial uses and users are considered.	Friends of Santa Clara River	No action. Any new groundwater extraction requiring vegetation disturbance or grading will be considered development. Under discretionary SEA CUP, biologists can evaluate any apparent biological impacts from groundwater extraction.
<b>Water Sources</b>	The review should include the effects of hardscaping over ground water recharge areas, pumping from water wells that will lower water levels and impact groundwater dependent ecosystems, etc. The Santa Clara River watershed is home to 17 federally listed species, many of which have habitat that is intrinsically linked to groundwater and the associated beneficial uses. The revised SEA ordinance describes several items which must be reviewed either by the County biologist or through the SEA TAC and other review processes, but the effect that a proposed project may have on the water needed to support GDE's and associated beneficial uses in that SEA is not one of them.	Friends of Santa Clara River	No action. Any new groundwater extraction requiring vegetation disturbance or grading will be considered development. Under discretionary SEA CUP, biologists can evaluate any apparent biological impacts from groundwater extraction.
<b>Water Sources</b>	We ask that sufficient water for a GDE's and associated beneficial uses and users be added to the review criteria.		No action. Any new groundwater extraction requiring vegetation disturbance or grading will be considered development. Under discretionary SEA CUP, biologists can evaluate any apparent biological impacts from groundwater extraction.
<b>Water Sources</b>	coordinate with the relevant Groundwater Sustainability Agencies, in which the SEA may be located to ensure groundwater dependent ecosystems and associated uses and users are adequately considered in project authorization, and in helping to support GSA objective and management targets. According to the California Sustainability Groundwater Management Act (SGMA) and Water Section 10720, Groundwater Sustainability Plans (GSP) and/or Groundwater Management Plans (GMP) are required to identify and consider impacts to Groundwater Dependent Ecosystems (GDE) that have significant and unreasonable adverse impacts on all recognized beneficial uses of groundwater and related surface waters.		No action. Any new groundwater extraction requiring vegetation disturbance or grading will be considered development. Under discretionary SEA CUP, biologists can evaluate any apparent biological impacts from groundwater extraction.
<b>Wildlife Linkages</b>	we request the ordinance update to recognize the contribution of city wildland linkages to wildlife support and movement beyond city boundary lines. (Native plant communities, invasive species and wildlife do not recognize man-made boundaries!)	Sierra Club-Diamond Bar	No action. The Department recognizes the importance of wildlife linkages and corridors and is a goal within the LA County General Plan .
<b>Wildlife Linkages</b>	the updated SEA needs to fully recognize not just the "wide ranging biodiversity" of our SEA wilderness, but also of the importance of wildlife corridors in maintaining this biodiversity.	Mike Hughes	No action. The Department recognizes the importance of wildlife linkages and corridors and is a goal within the LA County General Plan .
<b>Wildlife Linkages</b>	In East San Gabriel Valley, we believe SEA 15, the Aera property and Tonner Canyon/Tres Hermanos Ranch properties are extremely important in linking currently protected areas.	Sierra Club-Diamond Bar	SEA 15, Puente Hills SEA, is part of the proposed Conceptual SEA Update that official designates the conceptual SEA as an official SEA subject to the Ordinance.
<b>Wildlife Linkages</b>	Request that Tres Hermanos Ranch not be developed.	Danielle Robinson	SEA 15, Puente Hills SEA, is part of the proposed Conceptual SEA Update that official designates the conceptual SEA as an official SEA subject to the Ordinance.
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<b>BCM</b>	Your Biological Constraints Map requirements should allow typical vegetation maps, which deal in Holland code associations/alliances, each of which is given a CDFW rank, from which you could back out the SEA Resource Category. Ensure that the BCM comports with the requirements for MM-BIO-1 in the 2035 General Plan EIR. Allow the use of Holland code associations/alliances that are then backed out to derive your SEA Resource Category levels. Make it clear that the CDFW rank for that class governs in all instances. Only fall back to the tailored NatureServe assessment criteria if no CDFW ranking exists. The way it's currently worded, you're creating a gray area that project opponents could exploit to say they disagree, by parsing the NatureServe assessment as they choose. So: ""SEA Resource Category 4" includes natural communities ranked G4, S4, G5 or S5 by the CDFW, or utilizing NatureServe's Conservation Status Assessment methodology where no CDFW ranking exists for that community; plant species categorized by CNPS as RPR 4; and habitat occupied by annual or herbaceous RPR 4 plant species."	Stephen Maxwell (AV resident)	CDFW no longer supports the use of Holland Classifications, and as such the SEA Ordinance relies on the Manual of California Vegetation. Added clarifying language in the Guide that NatureServe's methodology may only be used where it has been confirmed by CDFW that no CDFW ranking exists for the community identified, and any such ranking should be done in coordination with CDFW (Chapter 6 page 65).
<b>BCM</b>	We suggest that an additional depiction include any lands that have been designated as critical habitat by USFWS. We also suggest that a "larger view" of the area be included to see if a particular SEA is part of a regional corridor or connectivity effort.	Hills For Everyone	Depiction of lands designated as Critical Habitat and the location of the project site in relation to SEA boundaries added to the list of requirements for the BCM (Chapter 6 page 64).
<b>BCM</b>	We emphasize the need (as mentioned in the Implementation Guide) for on-the-ground surveys by Certified Biologists to document biological resources on sites for proposed development. It is not sufficient to rely on the California Natural Diversity Database (CNDDDB) maintained by the California Department of Fish and Wildlife (CDFW), as areas of proposed development may not have been adequately surveyed in the past and there is a backlog of survey information that CDFW has not had time to enter into the CNDDDB.	CNPS SG Mountains	No action. On-the-ground surveys by qualified biologists are required for BCMs and other biological reports.
<b>SEA Program Monitoring</b>	Chapter 8 of the Implementation Guide offers excellent contemporary ideas and requirements for mapping, reporting, and tracking. This chapter would be markedly improved if it included the assurance of dedicated staff, enforcement, or ongoing programmatic review needed to ensure the tenets of all banking and in lieu agreements are upheld. Please expand on Chapter 8, to include dedicated staff, and an associated budget.	CNPS & CBD	No action. Providing assurances of dedicated staff and associated budget is beyond the scope of this Guide (see Chapter 1 page 9 for description of the purpose and scope of the Guide).
<b>Sensitive Local Native Resources list</b>	22.102.020 Definitions. Y. "Sensitive Local Native Resources" (at pg. 9) should be provided as an appendix to the Implementation Guide and be regularly updated and required to be posted on the County's website.	CNPS & CBD	No action. An initial list and the framework for revising or adding to the list is included in Appendix B (page 105).

SEA Guiding Principles	<p>SEA Guiding Principles (at page 4)</p> <p><input type="checkbox"/> Biodiversity - Recognize that biodiversity is important to <del>creating</del> <b>maintaining</b> a sustainable Los Angeles County.</p> <p>o Justification – Los Angeles County natural areas are already sustainable, and the goal should be to maintain it. When development alters the landscape, biodiversity is often not sustained.</p> <p><input type="checkbox"/> Biodiversity <del>Create new</del> <b>Restore</b> places where biodiversity can be woven through the urban fabric.</p> <p>o Justification – Creating new places seems infeasible, however, restoring degraded areas through the urban areas is a feasible way to increase connectivity and biodiversity.</p> <p><input type="checkbox"/> Resiliency <del>Monitor</del> <b>Guide</b> development within SEAs to maximize preservation.</p> <p>o Justification – Because the County has put in place conditions on development in SEA’s, the County needs to take a leadership role in implementing the ordinance, not just monitoring development</p> <p><input type="checkbox"/> Resiliency - Encourage best practices for sustainable design in the SEAs that are aligned with <b>the protection of</b> natural resources.</p> <p>o Justification – The Significant Ecological Areas identify the best natural areas left in Los Angeles County and therefore the protection of these areas needs to be the highest priority of this program.</p>	CNPS & CBD	Revised language (page 4). Recommended changes align with intent of SEA Program and Guiding Principles.
Page 6	<p>Page 6 - Where occurring within SEAs, development activities are carefully <b>guided and</b> reviewed with a key focus on site design as a means for conserving fragile resources such as streams, woodlands, and threatened or endangered species and their habitats.</p> <p>o Justification – Because the County has put in place conditions on development in SEA’s, the County needs to take a leadership role in guiding the ordinance, not just monitoring development</p>	CNPS & CBD	Revised language per recommendation (page 6). We agree that a primary goal of the SEA Program is guide development to avoid impacts to SEA Resources.
Page 6	<p>Page 6 - The SEA Program does not change the land use designation or the zoning of a property; rather it uses <b>guidance and</b> biological review and the application of certain development standards to balance the preservation of the County’s natural biodiversity with private property rights.</p> <p>o Justification – Because the County has put in place conditions on development in SEA’s, the County needs to take a leadership role in implementing the ordinance, not just monitoring development</p>	CNPS & CBD	Revised language per recommendation (page 6). We agree that a primary goal of the SEA Program is guide development to avoid impacts to SEA Resources.
Fencing	NPS appreciates the standards for permeable fencing. The standards are consistent with NPS wildlife protection goals to avoid and minimize impacts and to allow for wildlife movement throughout the SMMNRA	NPS	No action.
Open Space Buffer - Dev Stands	The minimum 200-foot set back from the proposed project's boundary to adjacent park land or protected open space is consistent with NPS goals to preserve land acquired to protect native habitat. NPS suggest clarification in the new ordinance for instances where the 200-foot set back cannot be achieved owing to parcel size or location of a buildable site within a large parcel.	NPS	No action. If the required setback cannot be achieved, the project will require an SEA CUP, which gives the Department discretion to review the project more closely and require mitigation measures to reduce/minimize impacts on the adjacent open space.
p. 15	In the inset, Recommended Design Guidelines for Projects Within SEAs (page 15), item 2 refers to a 30% development footprint, where as the ordinance states a maximum of 25%. Please clarify.	EHL	Revised inset language to align with Ordinance provisions and Guide text (page 25).
p. 15	<p>Regarding item 4, steep slopes may well be biologically less valuable than gentler terrain,<sup>6</sup> and some level of encroachment should be allowed to better protect SEA resources. Typically, development projects avoid steep slopes to reduce grading costs.</p> <p>EHL recommends a modification as follows: Avoid placing any development on slopes greater than 25% unless the outcome is biologically superior.</p>	EHL	Revised inset language to clarify that priority should be given to avoiding impacts to sensitive resources.

p. 33	<p>The language in Land Divisions (page 33) is concise yet contains the essential preserve design precepts. What is conspicuously missing, though, is an illustrative site plan for a subdivision showing how a 75% conservation area/25% maximum development area can meet preserve design goals by concentrating development in the overall least sensitive location. While an illustration was included in the March 21, 2018 Planning Commission Workshop presentation, this illustration fails to show how baseline unit count can be maintained through clustered design, along with greater open space and fire defensibility. This maintenance of unit count is important to convey to landowners.</p> <p>The discussion of Large Lot Parcel Maps should reflect the clarifying language for ordinance section D(4) suggested above. This can be done through this edit: The process will allow for the potential of large contiguous parcels of sensitive habitats to remain intact, while also providing that individual parcels have a reasonable opportunity to undergo an SEA Review (per 22.102.060) for future proposed development.</p>	EHL	Added graphic and clarifying language in Guide (page 46-47).
p. 33	<p>In addition to covering setback requirements and necessary amounts of Resource Category 4 and/or 5, the discussion in the Guide should expand to include ways to achieve the minimum 75% contiguous open space set aside. Such language might be, "For complying with the subdivision open space requirement for a minimum of 75% contiguous open space, and to maintain unit count, one or more dedicated open space lots may be created, or "pie shaped" lots utilized to effectively cluster development at the apex of these lots."</p>	EHL	Added graphic and clarifying language in Guide (page 46-47).
p. 33	<p>The Biological Constraints Map (BCM) will be the essential tool for guiding and ensuring compliance with the minimum 75% open space requirement for subdivisions. This information should be reflected in the Informational Exhibit for Large Lot Parcel Maps.</p>	EHL	No action.
p. 33	<p>The Guide also portrays field surveys as unlikely to be warranted. Yet high quality biological information should be developed as early as possible during project review, and as should information on impact identification and avoidance for CEQA purposes. There is no reason to exclude field surveys from subdivision processing. We suggest the following edits: Large Lot Parcel Map subdivision projects will be required to submit an Informational Exhibit and a BCM. The Informational Exhibit should consist of materials that show development feasibility on the proposed lots <b>and open space amount and configuration</b>. The BCM for a Large Lot Parcel Map subdivision project can be based <del>solely</del> on a desktop analysis of the area using the best available data and most recent aerial imagery available <b>as supplemented by</b>. <del>No field surveys if directed by Department staff are required at this stage, such as for</del> although field verification of SEA Resource Categories <del>may be warranted in some circumstances</del>.</p>	EHL	Revised language as suggested (page 47).
p. 45	<p>The "thought process" questions posed under each finding strike a good balance between being scientifically sound and being readily understood by the lay reader.</p>	EHL	No action.
p. 50	<p>The Biological Constraints Map (page 50) is well prepared and useful.</p>	EHL	No action.

p. 58	<p>graduate degree was on oak population genetics and ecology.</p> <ul style="list-style-type: none"> <li>- As much as possible, using local seed or assisted migration of seed is best.</li> <li>- From the work my advisor and I did at UCLA, seed and pollen dispersal is so limited in oaks if you really wanted to preserve genetic variations in a local population you would have to reduce that number to 2 miles. Long lived species like trees should be a special concern for this issue, especially oaks, getting them from the same site or within less than a mile would be great. However, when that is not possible, I think that it would be better to plant an oak woodland from seed from the Los Angeles Basin, than to restrict people from planting them at all, since oaks provide habitat to so many other species.</li> <li>- Many times in highly fragmented areas, with as much development as we have in this area and with all of the microclimates in LA County there may not be seed available for a species within 10 miles. I do not think that this should restrict habitat restoration projects from planting natives from within Los Angeles County and its environment <ul style="list-style-type: none"> <li>o What if the seed might be there but there may not be the ability to harvest it (in a protected park or conservancy)? What if the seed source is from a small number of plants and you are potentially creating a bottleneck effect?</li> <li>o What if a manmade cattle pond and farming area is being restored and there are not nearby wetlands, would that restrict the restoration of plants in the old cattle pond?</li> </ul> </li> <li>- 10 miles is such a generic number and does not really improve your chances of getting seeds that have the adaptations and genetics from the existing site. To be honest, some of the seed from less than 10 miles and 1000 ft elevation away from Descanso and the Verdugo section of the SEAs would be pretty inappropriate adapted to our site - the seed from the farther areas in Burbank would be more appropriate than the much closer seed from across the freeway in the San Gabriel foothills, where the soil types are very different.</li> <li>- In highly disturbed areas, like old farms, planting short lived pioneer species, like annuals, coyote bush or poppies etc. the adaptation that you may have lost by bringing a plant from farther away will rapidly be regained with short generation time. Plus these plants provide perching opportunities for birds, and hiding spots for small mammals who can disperse local seed into the space over time.</li> <li>- Then there is the conundrum of what is native anyway- as more people grow native plants in their gardens, how do you know that the plants you are selecting from nearby are truly natural? For example, Descanso's founder Manchester Boddy and Theodore Payne planted and probably hybridized sycamores on our site in the 1940s. Should we choose those for our seed source nearby, or completely native seed from farther away?</li> </ul>	Rachel Young (SEATAC)	Revised language to incorporate recommendations into Chapter 7 of the Guide (page 72).
p. 61	On-site Preservation for SEA CUP (page 61) We concur with the preservation ratios, noting their conformance with standard practices. The suitability questions and design guidance are helpful.	EHL	No action.
p. 63	<p>Off-site Preservation for SEA CUP (page 63)</p> <p>We note that the ordinance's focus on resource avoidance coupled with the on-site open space requirements will generally obviate the need for off-site acquisition for mitigation purposes.</p> <p>Consistent with above comments on off-site mitigation, we suggest the following edit:  Developments that do not have suitable habitat <b>of long-term biological viability available</b> to preserve open space on-site will be required to provide an equivalent amount of open space preservation off-site.</p>	EHL	No action. Factors that need to be considered when determining whether on-site habitat is suitable for preservation is described in the previous section "On-Site Preservation for SEA CUP" (page 76).
P. 67	Given the high vulnerability of the area to fires, we suggest that additional language be added that allow for a longer monitoring period should a fire occur during the restoration project.	Hills For Everyone	No action. Chapter 8 summarizes the program wide monitoring that will take place to evaluate effectiveness of the SEA Program and evaluate cumulative impacts. Monitoring periods for restoration projects are discussed in Chapter 6 of the Guide (page 69).
Sensitive Plant List	We note that a county sensitive plant list was mentioned in the appendices, but we could not find it. There certainly should be a Los Angeles County sensitive plant list similar to that of the Angeles National Forest or analogously, to the Audubon Sensitive Bird List.	CNPS SG Mountains	A sensitive plant list is currently under development. The framework for the list is included in Appendix B of the Guide (page 105).

<b>Tree Seed Source</b>	Special thought should be given to sources of tree seed and other long lived species. All stock should be from plants within Counties in or adjacent to the SEA. Nurseries used to grow stock should also be within counties in or adjacent to the SEA to prevent spread of soil born diseases and insect pests.	Rachel Young (SEATAC)	Recommendations incorporated into Chapter 7 of the Guide (page 72).
<b>Best Management Practices</b>	<p>A couple other recommendations:</p> <ol style="list-style-type: none"> <li>1. Use plugs rather than larger plants to reduce the need for irrigation during establish to conserve water resources. This also helps plants establish new roots that are adapted to the soil in the ground, rather than having a large root mass adapted to the soil in the nursery pot.</li> <li>2. If irrigation is required, describe the plan to control annual weeds that might occur and thrive from the irrigation.</li> <li>3. I personally do not want to see any proposals for regular herbicide treatments without a plan for mulching, or revegetation. This is a common practice throughout the county currently and from the research and sites I have observed, this treatment serves no benefit (and may cause some harm). If someone wants to use herbicide I'd like to see a couple of things. a.) That they have tested other methods of invasive species control and have determined a single application of herbicide is the best solution. b.) They have a post application plan for revegetation and/or mulching. c.) The treatment is a one time application. d.) Preemergent herbicide should never be used, as it may affect rare species in the seed bank.</li> <li>4. There is a lot of thought out there about mulch. There is a native plant contingent out there that is anti mulch because of nesting habitat for native bees. My recommendations for dealing with this issue is as follows. a.) Mulch is necessary in restoration to insure native plants thrive and survive to provide food for native bees. Without native flowers, there is no bee habitat. It is the least harmful and most beneficial way to prevent weeds, promote healthy soil, and help restore healthy organic material in the soil. One application of mulch can promote storage of large amounts of carbon in soils for years to come, helping with global climate change. It prevents water loss up to 30%. Almost all native habitat, outside of some desert ecosystems, have deep layers of organic material near trees and shrubs, keeping their roots cool and preventing evaporation. b.) And area for native been nesting without mulch can be set aside and marked. Monthly weeding will be necessary in this area until native plants can be established. Leaving restored areas unmulched and/or unweeded for bees in the long run will prevent native plants from establishing, promote invasive species that can encourage fires, and provide few resources for the native bees.</li> <li>5. For weed removal projects, clear description of how green waste is handled should be part of the proposal.</li> <li>6. A mention should be made about cleaning equipment for development and brush clearance. Much of the new mustard and possibly the start thistle infestation we have may have come in on Fire department brush clearance and LA Conservation corps equipment.</li> </ol>	Rachel Young (SEATAC)	Recommendations incorporated into Chapter 7 of the Guide (page 72).
<b>Prohibited Plant List</b>	<p>As a horticulture expert I think there are many plants on the list of prohibited plants that are too restrictive, as well as several that should be added:</p> <ul style="list-style-type: none"> <li>California Buckeye should be restricted to its natural range</li> <li>Mexican feather grass should be restricted to its natural range</li> <li>Fennel, artichoke, mustards and cardoons should be restricted</li> <li>Convolvus should be restricted (except the native species, in its natural range)</li> </ul>	Rachel Young (SEATAC)	No action. Mexican feathergrass, fennel, artichoke, mustards, and cardoons are all on the list. California Buckeye is a common, naturally occurring tree on the desert slopes of the San Gabriel Mountains. This is part of its natural range, which extends from the San Joaquin Valley. This species range may be expected to expand as a result of climate change, but as this is a native tree to the region, we would not consider it to be invasive, but rather an range expansion.

<p><b>Invasive Species</b></p>	<p>For me the definition of an invasive species is one that reproduces and changes the ecosystem in which it grows, preventing other species from surviving. From my experience, most of the plants you see below would not fulfill that definition in Southern California.</p> <p>Salix babylonica (unless you have a real significant pond)</p> <p>Prunus cerasifera (will not survive without serious supplemental irrigation)</p> <p>Leptospermum</p> <p>Aeonium</p> <p>Cotyledon</p> <p>Amaryllis</p> <p>Calendula</p> <p>Cosmos</p>	<p>Rachel Young (SEATAC)</p>	<p>No action. The invasive species list has been reviewed extensively by all three County Biologists and cross-checked with Herbarium records, existing county invasive species lists, and the CAL-IPC website.</p>
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