



## United States Department of the Interior

NATIONAL PARK SERVICE  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, California 91360-4207

In reply refer to:  
L76/ (SAMO)

May 31, 2018

Iris Chi, Program Manager, SEA Program Update  
Los Angeles County Department of Regional Planning  
320 W. Temple St.  
Los Angeles, CA 90012  
Transmitted via Email: sea@planning.lacounty.gov

Dear Ms. Chi:

The National Park Service (NPS) has reviewed Draft 9 of the Significant Ecological Areas (SEA) Ordinance and the Implementation Guide (IG) prepared by Los Angeles County (County). The revised SEA Ordinance would update the Conservation and Natural Resources Element within the SEA program (Program No. C/NR-2) in the Los Angeles County General Plan 2035.

In 2000, NPS nominated the Santa Monica Mountains as one SEA. NPS appreciates the County's response to the nomination by creating the new Santa Monica Mountains SEA. NPS also thanks the County for the extensive work expanding the SEA Program and developing a practical implementation process. NPS provides comments on the effects of private and public land development in the Santa Monica Mountains at the invitation of state and local units of government with authority to prevent or minimize adverse uses. NPS assumes a neutral position and does not support or oppose land development in offering the following comments on the draft ordinance.

Definitions: Section 22.102.020

Item D. NPS 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.

Development Standards: Section 22.102.080

NPS recommends aligning the SEA Resource Categories between the Development Standards and Definitions sections. In Item A of the Development Standards section, SEA Resource Categories are outlined for Resource Categories 1 through 4. The Definitions section includes Resource Categories 1 through 5. NPS recommends adding Resource Category 5 to the Development Standards section.

Development Standards: Section 22.102.080

NPS recommends the County 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.

Development Standards: Section 22.102.080

Item D.4. of the Land Use Specific Development Standards contains ambiguous language: “Large lot parcel maps for sale, lease, finance, or transfer purposes, shall demonstrate that all resulting parcels have reasonable potential for future development that meets the standards for SEA Review...” 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.

Open Space: Section 22.102.090

Item D.2., Open Space Preservation Mechanisms. NPS recommends that the open space dedication order be revised to address 2.a (non-profit organizations) and 2.b (government entities) with equal priority. Additionally, the text may suggest the conveyance to a public park or open space management agency within the government entity category (2.b).

Implementation Guide (IG): SEA Boundary Map (General Plan 2035, Figure 9.3)

NPS recommends adding a symbol into the legend to identify the dashed green line as the Angeles National Forest boundary. Additionally, please add the SMMNRA boundary line to the map and legend and item description in the legend to identify both federally designated boundaries.

IG. Area-wide Development Standards: Impermeable Fencing, Walls, Enclosures, and Signage

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 SMMNRA.

IG. Area-wide Development Standards: Open Space Buffer

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 suggests 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.

Thank you for the opportunity to comment. If you have questions, please call Melanie Beck, Outdoor Recreation Planner, at (805) 370-2346.

Sincerely,



David Szymanski  
Superintendent

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy  
Craig Sap, Acting Superintendent, Angeles District, State Department of Parks and Recreation  
Clark Stevens, Executive Officer, Resource Conservation District of the Santa Monica Mountains