



## LEONA VALLEY TOWN COUNCIL

P.O. Box 795 • LEONA VALLEY • CA 93551

February 28, 2011

Mr. Jodie Sackett  
County of Los Angeles Department of Regional Planning  
320 West Temple Street  
13<sup>th</sup> Floor  
Los Angeles, California 90012

Re: Tentative Tract 0066952  
Valley Vineyards  
Leona Valley, California

MAR 2 - 2011

Dear Mr. Sackett:

It is our understanding that there have been substantial changes to the proposed tentative tract known as Valley Vineyards, including recent revisions to the actual tract map. Since there have been numerous modifications since its inception, we believe there is a potential for piecemealing of this proposal, both on a County and State level, in violation of the California Environmental Quality Act. We trust that you will make every effort to ensure that no violation of CEQA has or will occur.

With changes to the project, it is important to revisit the issue of the Antelope Valley Area Wide Plan. The Leona Valley Town Council's Development Committee has thoroughly examined the document that was adopted by the Los Angeles County Board of Supervisors on December 4, 1986. While the update process of the Antelope Valley Area Wide Plan (now known as Town & Country) began many years ago, the 1986 Plan is still applicable until Town and Country has been adopted.

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Our research has revealed that there are numerous conflicts and issues with the proposed project as related to the Antelope Valley Area Wide Plan. While we believe you probably have reviewed the Plan as it relates to the Valley Vineyard Proposal, we shall provide four of many examples that should be considered for said subdivision.

**Example #1:**

**Significant Ecological Area**

“Each development proposed with a designated (or potential) SEA will be reviewed for compliance with the following criteria:

- a) The development is designed to be highly compatible with biotic resources present, including the setting aside of appropriate and sufficient undisturbed areas;
- b) The development is designed to maintain water bodies, watercourses, and their tributaries in a natural state;
- c) The development is designed so that wildlife movement corridors (migratory paths) are left in a natural and undisturbed state;
- d) The development retains sufficient natural vegetative cover and/or open spaces to buffer critical resource areas from the proposed use;
- e) Where necessary, fences or walls are provided to buffer important habitat areas from development;
- f) Roads and utilities serving the proposed development are located and designed so as not to conflict with critical resources, habitat areas or migratory paths; and
- g) Clustering of structures is utilized where appropriate to assure compatibility with the biotic resources present.”

The project is located in a “Draft” Significant Ecological Area, which would qualify as a “potential” SEA under the criteria as identified above. The proposed development includes ±117 detached single family dwellings clustered but spread out across nearly 300 acres. As required by the General Plan, 70% is to be dedicated to open space, however, the open space is planned for vineyard and the land will not be kept in a natural, undisturbed state. The property is located in the “Draft” Significant Ecological Area, which has been pending approval since early 2008, but under consideration since 2004.

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The proposed plan does not retain sufficient natural vegetative cover; the proposed vineyard will obstruct foraging habitat of site specific species; areas are not maintained in an “undisturbed” state; clustering is not appropriately applied to protect biotic resources. These sites should be preserved in as natural and viable condition as possible. The project fails to establish protective measures for rare and wildlife habitats as required by Item #122, page V-15 of the AV Area Wide Plan.

**Example #2:**

**Waste Disposal Facilities**

As per Page V1-5 and page V-24, Items 197-200 of the AV Area Wide Plan:

“All applications for environmentally sensitive uses, ....including waste disposal facilities...or other similar uses shall include a full environmental analysis to identify potential negative impacts.” In the case of the proposal for waste disposal, approved site restoration shall be required at the termination of such a use. Applications in connection with potential siting of solid or liquid waste disposal facilities shall undergo through public review and environmental review for potential significant impacts on the environment and compatibility with adjacent land uses. The review shall involve the public hearing process and be conducted pursuant to the provisions of the County Solid Waste Management Plan. The indicated on-site sewage treatment plant as proposed will service ±117-single-family dwellings and should require a full environmental impact report. According to the State of California Department of Water Resources, the use of an Advanced Treatment System with a centralized treatment area (there are four centralized treatment areas) constitutes a waste treatment plant.

**Example #3:**

**Seismic Safety Management**

As per page III-4, AV Area Wide Plan:

The Antelope Valley Area Wide Plan dictates specific criteria related to seismic safety management zones (fault zones, liquefaction, etc), an area in which the subject property is presently mapped by the United States Geological Survey. The seismic hazard requirement indicates a minimum lot size for the subject property to be restricted to a very low density of .5 density units per acre (1 dwelling per two acres of land). Furthermore, new residential development may be permitted to only those densities prevalent in the immediate surrounding

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area (Page VI-17). The density as proposed for the project does not conform to the densities prevalent in the *immediate* surrounding area (Parcel Area 3206).

**Example #4:**

**Hillside Management Areas**

As per Page III-4 and Page VI-23, Item (3), AV Area Wide Plan:

“Residential uses at very low densities (up to 0.5 d.u./acre depending on slope) and other appropriate uses would be accommodated provided that the integrity of the hillside formation and its natural vegetation is retained.”

The Antelope Valley Area Wide Plan also states:

“Open or Natural Area Standards: a minimum of 70% of the hillside area to be included in a development shall be retained in an open and natural condition.” The Valley Vineyard development calls for the removal of the “natural vegetation” to be replaced by vineyard, which is in violation of the Antelope Valley Area Wide Plan. These aforementioned issues as well as numerous other items must be considered prior to submission and consideration by the Planning Commission.

As per our well-attended February 14, 2011 community meeting, the Leona Valley Town Council and the residents believe that this project requires a complete environmental impact report. As part of our public testimony, we will request that this study be completed. As per the Antelope Valley Area Wide Plan as well as prior submitted documentation, there is sufficient evidence to support such a requirement. While the timeline between now and the proposed hearing date is quite short, we will be submitting further documentation related to inconsistencies with the Antelope Valley Area Wide Plan, State of California and Federal requirements and other project deficiencies.

We also understand that the Tentative Tract Map has been updated, and as required by the California Environmental Quality Act, the Leona Valley Town Council as an interested party to this action must be provided with a copy of the new map by the County of Los Angeles. All other prior tract map updates have been issued by your office. Please provide a copy at your earliest convenience.

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Should you require further information concerning these and other serious issues pertaining to the Antelope Valley Area Wide Plan and this project, please feel free to contact us.

Kind regards,

A handwritten signature in black ink, appearing to read "Bill Elliott". The signature is written in a cursive, flowing style.

Bill Elliott

President

Leona Valley Town Council