August 7, 2014

Ms. Connie Chung, AICP,
Supervising Regional Planner
County of Los Angeles
Department of Regional Planning
330 West Temple Street, Room 1356
Los Angeles, CA 90012

RE: Notice of Completion of the Draft EIR for the Los Angeles County General Plan Update

Dear Ms. Chung:

Thank you for providing the City of Palmdale with the opportunity to comment on the Draft EIR Los Angeles County General Plan Update. The City of Palmdale takes pride in the affordable housing available to our residents, the commercial and industrial development, and the visual character that exists within the Antelope Valley.

Based upon information provided within the draft EIR, land use, air quality, traffic and water availability issues will be significant and unavoidable based upon the proposed project. The Antelope Valley Planning area is recognized in 2013 as having 24,739 housing units, a population of 93,490, a total of 31,838 jobs and a jobs-housing ratio of 1.29. Post 2035, the corresponding numbers are 278,158 housing units, a population of 1,070,571, a total of 51,219 jobs and a jobs-housing ratio of 0.18. The project proposed, increasing the population within unincorporated areas by over 50 people for every job created, is completely unacceptable to the City of Palmdale.

Under the proposed project, the County of Los Angeles is pushing for a significant increase in the population and housing within the Antelope Valley while providing extremely limited employment opportunities. This will lead to either significant unemployment with the AV or a significant increase in the number of AV residents commuting on the already crowded State Route 14. This is completely contrary to the requirements of AB 32 (California Global Warming Solutions Act of 2006) and SB 375 (Sustainable Communities and Climate Change Protection Act of 2008) and the AVAQMD's attainment plans. The proposed course of action will
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significantly increase VMT within the region and have significant and unavoidable impacts of air quality and greenhouse gases.

The Antelope Valley Reduced Intensity Alternative is the preferred alternative as it aligns with the Antelope Valley Area Plan, also known as the Town and Country. The Town and Country is proposed as a current component of the Los Angeles County General Plan, however not mentioned in the proposed Draft EIR.

The City of Palmdale appreciates the opportunity to comment on the draft Environmental Impact Report. Should you have any questions please contact Juan Carrillo or me at (661) 267-5200.

Sincerely,

Susan Koleda, AICP
Acting Planning Manager