

Leon Freeman

From: Jacki Ayer [airspecial@aol.com]
Sent: Wednesday, February 19, 2014 11:06 AM
To: DRP General Plan Project
Cc: tuckertwo@hughes.net; Katherine.Tucker@ngc.com; m_r_hughes@earthlink.net;
rjactontowncnci@aol.com; blumranch@aol.com; thorx655@earthlink.net
Subject: Comments on the Draft General Plan
Attachments: comments on the draft general plan.pdf

Follow Up Flag: Follow up
Flag Status: Completed

To the planning staff In the Department of Regional Planning:

Please accept these timely submitted comments and concerns regarding the Draft General Plan. Please do not hesitate to contact me at AirSpecial@aol.com if you have any questions or comments.

Sincerely
Jacqueline Ayer
Acton resident

Los Angeles County Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012
Phone: 213-974-6417
Fax: 213-626-0434
genplan@planning.lacounty.gov

February 19, 2014

Subject: Comments on the Draft General Plan and Its Long Term Implications for Rural Communities like Acton.

Reference: Draft General Plan Dated January, 2014
Planning Commission Hearing Scheduled February 26, 2014

Enclosed please find my comments on the draft General Plan. In particular, they address the extent to which it protects and preserves rural equestrian communities like Acton.

As a preliminary comment, I am particularly troubled that the draft General Plan fails to identify the intrinsic characteristics that make a community “rural” and, by extension, it fails to establish meaningful goals and policies to protect these “rural” characteristics. To the contrary, it offers two vaguely worded policies about protecting “rural communities” and preserving “rural character” without addressing how “rural character” will be preserved or even what “rural character” actually is. The Land Use Implementation Program is particularly deficient in this regard; while it specifically discourages “incompatible development” in rural communities, it fails to provide any insight into what “compatible” rural development actually looks like. The Draft General Plan therefore lacks the foundational elements essential to any determination of what constitutes “compatible” rural development (and, by extension, “incompatible” rural development). Simply put, the rural protection policies offered in the Draft General Plan are not founded on a clear understanding of what constitutes “rural”, and will therefore have no weight or effect.

The draft General Plan constitutes a significant departure from the existing General Plan, which

- Specifically defines “rural communities” as dispersed developments that lack urban infrastructure and *which are intended to remain so*, and
- Sets forth specific policies that avoid intensive development and constrain new development to match the density and intensity of the surrounding area and ensure new developments in rural communities do not cause, or rely on, the expansion of existing infrastructure.

All of this is eliminated in the draft General Plan, which presents a fundamental “paradigm shift” in how rural communities are perceived by Los Angeles County Planning staff, and, more to the point, how they will be “managed” in the future.

In the existing General Plan, rural communities are described as:

"Non-Urban lands primarily include mountain, foothill, and high desert areas of the County, not currently planned for urban use or scheduled to receive an urban level of service. The intent of this classification is to maintain the character of dispersed non-urban settlements and communities; provide for agricultural and mineral production, preserve areas of significant natural and scenic resources; and avoid intensive development of areas subject to severe natural hazards or lacking essential services and facilities"

The specific policies set forth in the existing General Plan to protect this “rural community” vision are all but eliminated in the draft General Plan. For instance:

Existing General Plan Policy 23 (page I-21): “Ensure that development in non-urban areas is compatible with rural lifestyles, does not necessitate expansion of urban service systems and does not cause significant negative environmental impacts or subject people and property to serious hazards”. This policy specifically precludes the development of any commercial or residential projects which cause the expansion of urban service systems in rural communities (including traffic signals, street profiles/lights, etc.). It also precludes intense commercial development along established equestrian trails and in pedestrian areas (such as near schools) that would subject people to serious hazards. Not only does the proposed General Plan eliminate this substantial and protective policy, it establishes the contrary principal that limited infrastructure (such as exists in rural communities) constitutes an ongoing “deficiency” which must be addressed. For instance, page 16 of the draft General Plan states: “The General Plan establishes policies and programs to address existing deficiencies in community services and infrastructure, and to ensure the provision of sufficient community services and infrastructure for new developments”. The draft General Plan fails to grasp the simple truth that limited infrastructure is precisely the thing that will preserve rural communities like Acton that wish to remain rural.

Existing General Plan Land Use Policy 9: “Promote neighborhood commercial facilities which provide convenience, goods and services and complement the community character through appropriate scale, design and locational controls.” The Draft General Plan completely eliminates the concept (so critical to rural communities) that the location, scale, and design for new neighborhood commercial development should be informed and guided by the character of the surrounding area ^{1,2}. In its place, the Draft General Plan merely establishes a FAR which is so absurdly high that it ensures only high density/high intensity commercial development in Acton (see attached for more details).

Existing General Plan Land Use Policy 7: “Assure that new development is compatible with the natural and man made environment by implementing appropriate locational controls and high quality design standards”. The Draft General Plan eliminates this policy, and replaces it with LU 6.7: “Protect rural communities from the encroachment of incompatible development”. This policy is presented by the Draft General Plan as a perfunctory statement that is not explained, discussed or even addressed anywhere in the document; as such, it provides no protection at all for rural communities.

Existing General Plan Land Use Element Policy 8: “Protect the character of residential neighborhoods by preventing the intrusion of incompatible uses that would cause environmental degradation such as excessive noise and traffic”. This policy is completely eliminated in the draft General Plan and not replaced with any commensurate policy. In fact, the draft General Plan does

¹ It is true that, under the Draft General Plan, Policy LU 9.3 requires the scale and design of new and remodeled buildings to “Consider the built environment of the surrounding area”, but this policy is entirely focused solely on the building “appearance”; it does not address locational controls necessary to the determination of whether a proposed commercial project is properly sited. For example, the existing General Plan compelled DRP to consider the appropriateness of locating the high density, high intensity “Panda Project” (generating 4,382 vehicle trips per day) adjacent to the High Desert Middle School in Acton. These “locational controls” are eliminated in the Draft General Plan.

² The analysis presented herein is based on the assumption that commercial developments in Acton are designated as “Community Commercial [C]”, which consistent with the Antelope Valley Areawide Plan.

not contain a single land use policy that seeks to protect rural residential communities like Acton from excessive traffic resulting from commercial development. To the contrary, the draft General Plan explicitly endorses visitor-serving commercial development in rural communities like Acton which, by definition, will significantly increase traffic loads in our community from the freeway and surrounding highways (see RC [rural commercial] land use description on page 76).

Page III-24: Locally serving commercial and industrial projects should be located so as not to “conflict with established community land use, parking, and circulation patterns”. The notion that local commercial projects should be constrained so as not to conflict with existing land use patterns is eliminated in the draft General Plan and not replaced with any commensurate policy. In fact, and as noted previously, the draft General Plan does not include any land use policy that protects rural communities like Acton from excessive traffic resulting from commercial development.

Existing General Plan Page III-35: The scale of local service commercial uses in terms of acreage and floor area must be “limited to that which can be justified by local community and neighborhood needs. In most cases, such uses in aggregate should not exceed 10 acres”. The draft General Plan completely eliminates the entire concept of limiting local commercial development to that which can be justified by local community needs.

Existing General Plan Page III-36: The overall scale and intensity of local commercial service uses should be “in keeping with the surrounding neighborhood or community setting”. The draft General Plan eliminates any requirement limiting the scale and intensity of local commercial development based on the surrounding neighborhood, and replaces it with a high fixed floor ratio which virtually guarantees high intensity, urban-style commercial development in Acton.

Existing General Plan Page III-37: The size and intensity of local commercial projects “should be confined to the extent that anticipated traffic generation does not adversely affect conditions on adjacent streets and highways”. This protective policy, which minimizes traffic impacts of local commercial projects by limiting the intensity of the project itself, is replaced in the draft General Plan by policies which facilitate intense commercial development by requiring road improvements to accommodate higher traffic loads. These policies will result in high intensity commercial development and heavy traffic loads in Acton,

Existing General Plan Land use Policy Map Notes state that the rural (non-urban) land use designation is assigned to “Areas not currently planned for urban use or scheduled to receive an urban level of service” and within Non-Urban areas, rural residential and certain other uses are permitted subject to established density, design, and service standards. The draft General Plan completely eliminates the concept of limiting growth in rural areas based on existing service standards. Worse yet, it replaces this principal with one which actually requires expansion of public services to facilitate growth (see page 16).

The attached presents additional comments/concerns regarding specific provisions of the draft General Plan. Please give these issues due consideration and revise the draft General Plan accordingly.

Sincerely,

Jacqueline Ayer,
Acton resident

ATTACHMENT – COMMENTS ON THE DRAFT GENERAL PLAN

1. On Page 16, under “Guiding Principles”, the draft General Plan states:

“The General Plan implements smart growth by using strategies that are tailored to each community. Strategies, such as transit-oriented development, will create vibrant centers around transit stations that promote neighborhoods where people can live, work, and shop without the need to drive to each Destination. Another smart growth strategy is to facilitate the creation of vibrant and active corridors that connect major centers and destinations, and thriving neighborhood centers within the unincorporated areas. These work in conjunction with other smart growth strategies to “green” streets and buildings, and protect and conserve its natural resources.”

Acton has a Metrolink transit station, and the freeway and highways in Acton that connect Santa Clarita with Palmdale clearly constitute a “corridor that connects major centers”. Acton is therefore (and without doubt) an obvious candidate for the high density residential development and high intensity commercial/mixed use development that is enthusiastically supported in, and explicitly advanced by, the draft General Plan. If this paragraph is not revised, it is certain that, shortly after the General Plan is adopted, someone will propose an intense commercial or mixed use development in Acton and claim (correctly) that such development is necessary and appropriate because it specifically advances this foundational “smart growth” strategy which essentially underlies the entire General Plan. And there is *nothing* in the draft General Plan that can be used to counter this position. In fact, DRP would be remiss in not approving such development, because doing so would be contrary to the foundational strategy of the entire Land Use Element. This, in combination with the excessively high commercial developmental densities (FAR = 0.5) authorized by the draft General Plan, virtually guarantees high density, high intensity development in Acton. To be clear, this Draft General Plan advocates and encourages commercial developments in Acton that have intensities which are *several times greater* than the “Panda project” (which, incidentally, had a FAR of only 0.14).

While this description of “smart growth” may be applicable to urban and suburban communities, it is NOT applicable to rural communities, and the draft General Plan errs substantially in not making this distinction. Therefore, it is unacceptable to the community of Acton. This paragraph must be revised to explicitly exclude rural communities from any consideration as “vibrant” transit centers or corridors. The following revision is recommended: “The General Plan implements smart growth by using strategies that are tailored to each community. Strategies, such as transit-oriented development in urban and suburban areas, will create vibrant centers around transit stations that promote neighborhoods where people can live, work, and shop without the need to drive to each destination. Another smart growth strategy is to facilitate the creation of vibrant and active corridors in urban and suburban areas that connect major centers and destinations, and thriving neighborhood centers within the unincorporated areas....”

2. On Page 16, under “Guiding Principles”, the draft General Plan states:

“Community services and infrastructure serve as the backbone of a community. Quality of life is dependent upon the quality and availability of schools, parks, libraries, police and fire services, cultural facilities, and community gathering places; as well as circulation systems, water, sewers, flood control, utilities, communication, and waste management. Successful land use planning and growth management rely on the orderly and efficient planning of community services and

infrastructure. The key to growth management is the commitment to proactively coordinate with public and private partners to provide and maintain sufficient services and infrastructure that are commensurate with growth. The General Plan establishes policies and programs to address existing deficiencies in community services and infrastructure, and to ensure the provision of sufficient community services and infrastructure for new developments.”

This paragraph is troublesome. Acton’s ability to retain its rural character in the future will hinge directly on whether or not it will continue to have only limited access to community services and infrastructure. In other words, it is precisely the deficiencies in Acton’s community services and infrastructure which secure our rural lifestyle. Contrary to what the draft General Plan states, the key to growth management in rural communities that wish to remain rural is to **limit** community services and infrastructure in a manner that constrains development and growth (especially “smart growth”). To be clear, a General Plan that is determined to address “existing deficiencies” in rural services and infrastructure is also a General Plan that is determined to ultimately change the rural profile itself. There is no getting around the fact that the application of this “guiding principal” to the rural community of Acton assures its destruction, not its preservation. This paragraph must be revised to address this concern.

3. On Page 17, the draft General Plan states “Los Angeles County as a whole is urbanized....” This statement is completely false; Less than 1/3 of the entire county is urbanized; most of it is rural/open space. More importantly, nearly all the land that is specifically addressed by the Land Use Element (more than 90%) is designated either rural or natural resource (See Table 6.1). As such, the emphasis that the draft General Plan places on urban form and urban-style “smart growth” is completely inappropriate.

4. On Page 17, the draft General Plan states:

“The General Plan also includes goals, policies and programs to minimize risks and discourage development in areas that are prone to safety hazards, such as earthquakes, floods and wildfires.”

It is noted that the entire county is prone to earthquakes and floods, and much of the county is subject to wildfires (including urban and suburban areas). Hundreds of thousands of homes have been built in earthquake-prone areas of Los Angeles County (take Northridge for example) and in fire-prone areas as well. It therefore seems unreasonable and improper to cite earthquake or fire concerns as a reason to “discourage” a property owner in Acton from building a home. Also, what exactly is meant by “discourage development” in earthquake, flood, and wildfire prone areas? Do you intend to withhold building permits from Acton property owners merely because Acton (like the rest of Los Angeles County) is earthquake prone?

5. Why are there no “Opportunity Area Maps” identified for the Santa Clarita Valley area? The Draft General Plan states (on page 49) that this area is one of the fastest growing areas in unincorporated LA County with 33,500 housing units approved just in the last 10 years. Yet, incredibly, no “Opportunity Maps” are presented for this area. This is particularly surprising, given the fact that the draft General Plan presents “Opportunity Maps” for limited growth areas like Acton.

6. On Page 62, the Draft General Plan states:

“Density Controlled Design, Natural Resource Conservation, and Hazard Mitigation. Density controlled subdivision design allows buildings to locate closer together on a smaller portion of land so that larger, contiguous natural resource areas may be conserved in a cohesive manner. Density controlled design can also mitigate the exposure of residential uses to hazards, such as wildfires, through the siting and design of open space.”

“Density Controlled Design” is simply the new term for “clustering”. The community of Acton has, for the last 10 years, made it clear to Regional Planning that it opposes “clustering” in Acton because it provides developers with the means of avoiding the Acton’s minimum lot size standards. Virtually every large subdivision map that Regional Planning has reviewed in Acton over the last 20 years has failed to meet Acton’s 2-acre minimum lot size requirements, yet they are approved anyway. Land Use Policies intended to further “Density Controlled Design” goals without regard for, and even at the price of, Acton’s community development standards is insupportable and must be revised accordingly.

7. On Page 63, the Draft General Plan states

“The Zoning Map is required to be consistent with the General Plan Land Use Policy Map”, and Table 6.2 identifies Rural land use designations which are limited to “Single family residences; equestrian and limited animal uses; and limited agricultural and related activities”.

Over the last 15 years, DRP has routinely approved high density commercial/industrial projects on rural, N1 and N2 parcels that do not have commercial land use designations in the proposed Land Use Map (see Appendix A of the draft General Plan: sheet 3 of the Antelope Valley Land Use Map). These uses are not single family residences, nor are they equestrian or limited animal uses, nor are they limited agricultural/related activities. Therefore, they do not comply with the Rural Land Use designations identified in Table 6.2. Please address this General Plan inconsistency.

8. Please make the following change to page 68:

Transit Oriented Development

Urban and suburban A areas with access to major transit and commercial corridors have the most potential for infill development. Transit-oriented development is well-suited for higher density housing and mixed uses, and commercial and civic activities. Transit-oriented development connects neighborhoods, and community and employment centers through a broad network of pedestrian, bicycle, transit, and roadway facilities.

Without this change, the community of Acton (which is bisected by a freeway, 3 major highways and has its own train station) is deemed well-suited to Transit Oriented development.

9. Page 70 states:

“The Impacts of Sprawl

Sprawl is a low-density land use pattern that extends development into greenfields and other undeveloped lands with limited or no infrastructure and transit options. A sprawling land use

pattern puts the unincorporated areas at risk of losing resources, such as agricultural lands, and will contribute to the fragmentation and isolation of open space areas. In addition, as sprawl is commonly located in areas with limited or no transit options, continuing this land use pattern contributes to traffic congestion, air pollution, and greenhouse gas emissions.”

Development in rural communities such as Acton has, by definition “a low density land use pattern” which extends into “undeveloped lands with limited or no infrastructure”. This paragraph clearly and explicitly disparages rural communities to such an extent that it seems to actively discourage their continued existence. The County cannot have it both ways; Either rural development and rural communities are to be encouraged and preserved so that they continue to thrive, or they are to be discouraged and ultimately eliminated. Please revise this provision because it is direct conflict with other sections of the draft GP that are ostensibly intended to preserve rural development.

10. Please make the following change on page 71:

“Community design in rural areas in the Antelope Valley ~~could be~~ is different from community design in urbanized communities, such as East Los Angeles and Florence-Firestone.”

11. Pages 71-72 state:

“Community design does not focus on the architectural style of a specific building or site, but rather groups of related elements and uses that when taken together, define a community. Community design considers the adjacency of building entry and sidewalk, the scale of new buildings relative to neighboring structures, and the relationship of the street to the sidewalk. Other examples include designing neighborhood gateways, streetscape improvements on a commercial corridor, consistent landscaping for streets, and uniform signage that can designate a special district within a community. Successful community design standards build upon the characteristics of both the natural and man-made environments that are unique to each community.”

This section on “Community Design” is troublesome because none of the examples given (such as “streetscape improvements”, “landscaping for streets”, “adjacency of building entry and sidewalk”, “relationship of the street to the sidewalk”, “neighborhood gateways”) apply to communities like Acton which, as a rural equestrian community that wishes to remain so (and which has limited water supply), generally opposes sidewalks, streetscape improvements, and street landscaping. The examples of development standards expressed here pertain to urban and suburban communities and are in fact contrary to the standards adopted by rural communities such as Acton. This discussion of “urban community design” should be identified as such, and this entire section should be expanded to include at least one example of a “rural community design” feature.

12. Page 72 states:

“In addition, providing substantial tree canopy cover, and utilizing light colored paving materials and reflective roofing materials, can reduce the urban heat island effect.”

The term “reflective roofing materials” is troublesome. Presumably, this term refers to either bright white or shiny (specular reflective) roofing materials. Such roofing materials in rural, low

density rural areas cause significant glare problems for the entire community. Anyone located within ½ mile (or more) of a specular reflective roof in Acton will experience painful glare, often throughout the day. More to the point, non-specular, light colored earth-tone roofing materials favored by Acton coupled with radiant barrier construction is highly energy efficient and successfully meets the EPA's "cool roof" energy efficiency objectives. This section should be revised accordingly.

13. Table 6.2 authorizes a FAR of 0.5 for non-residential uses on rural residential lands [see page 74 of the draft General Plan]. Where did this 0.5 value come from? It is **exceedingly** high for a rural area. With this FAR, a 2-acre rural lot is limited to just 1 house, but it can have 43,000 square feet of non-residential structures. How is this reasonable or appropriate?

14. Table 6.2 authorizes a FAR of 0.5 for "Rural commercial" land uses. This high density, high intensity development ratio is **completely inappropriate** for the rural community of Acton. DRP is reminded that the high density, high intensity "Panda Project" which was ultimately deemed inappropriate for Acton (and which included 8 fast food restaurants on 2 acres) had a FAR that was only 0.14. As it is currently written, this draft General Plan clearly and specifically authorizes commercial projects in Acton that are *three times more dense/intense* than the Panda Project.

15. According to Table 6.2, commercial uses on "Rural commercial" lands are supposed to be "visitor serving activities". The community of Acton has repeatedly told DRP that we **do not want** any commercial development that is intended to serve either visitors or the traveling public because such development causes significant traffic, noise and trash impacts in our community. The intent of Rural Commercial development should be to serve the local (rural) community in which it is located. Period. It is notable that, in urban and suburban areas, DRP specifically restricts commercial uses on "General Commercial" lands to local serving purposes, yet, inexplicably, does not place the same local-serving restrictions on "Rural Commercial" uses. This **MUST** be revised and corrected in the Final GP

16: The "warehousing and distribution" uses identified for "Light Industrial" land uses are not appropriate for rural communities such as Acton because of the traffic impacts that such uses generate.

17. If the highest residential density allowed on rural lands is 1 du/acre, why is 5 du/acre appropriate for rural mixed use? How is this consistent with a rural profile and why was it even developed?

18. Land Use Element Policy LU 3.2 states "Discourage development in areas with environmental resources and/or safety hazards". Given that the Draft GP designates the entire community of Acton as a "safety hazard" area (Figures 6.1, 12.1 and 12.6), how precisely will DRP discourage development in Acton? What does this statement actually mean for the residents and property owners of Acton?

19. Land Use Element Policy LU 4.1 states “Encourage infill development on vacant, underutilized, and/or brownfield sites”. This policy is problematic for rural communities, which have low density development and (by definition) consist entirely of parcels which, from an urban perspective, are either “vacant” or “underutilized” parcels. This policy should be revised to read: “Encourage infill development in urban and suburban areas on vacant, underutilized, and/or brownfield sites.

20. Land Use Element Policy LU 4.3 states: “Encourage transit-oriented development with the appropriate residential density along transit corridors and within station areas”. This policy fails to constrain such development to the 11 designated TOD Policy Areas that are explicitly identified in the draft General Plan (see Figure 6.4). Worse yet, it specifically encourages TOD development in rural communities like Acton that have a train station or are located on major highways, even though such development is clearly contrary to preservation of the “rural profile”. This policy must be revised to ensure that Acton and other rural communities cannot ever be construed as potential TOD areas; for instance: “Encourage transit-oriented development within designated TOD Policy Areas identified in Figure 6.4 with the appropriate residential density along transit corridors and within station areas”. [Incidentally, there is a typographical error on page 69, which indicates that the designated TODs are shown on Figure 6.3; in actuality, they are depicted on Figure 6.4]

21. Land Use Element Policy LU 4.4 states: “Encourage mixed use development along major commercial corridors”. As written, this policy is problematic; no map or definition of “major commercial corridor” exists in the draft General Plan. More to the point, since the draft General Plan does not limit its contemplation of “major commercial corridors” to only urban and suburban areas, it could easily be construed to include frontage property in Acton along the 14 freeway and Sierra Highway. This policy must be revised to ensure that it will not be relied upon to facilitate high density mixed use development within Acton in the future. For example: “Encourage mixed use development in urban and suburban areas along major commercial corridors”.

22. Under “Community Serving Uses”, Land Use Element Policy LU 5.1 states: “Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types and styles”. Precisely how is this policy “Community Serving”, particularly for rural communities? This policy applies only to urban and suburban areas, and should be clearly designated as such.

23. Under “Community Serving Uses”, Land Use Element Policy LU 5.2 states: “Encourage a diversity of commercial and retail services, and public facilities at various scales to meet regional and local needs.” This policy is troubling, particularly for rural communities. Commercial and retail development in rural communities should NEVER be intended to serve regional needs. Rather it should be limited in scope, density and intensity to serve local needs ONLY. This policy applies only to urban and suburban areas, and should be clearly designated as such.

24. Land Use Element Policy LU 6.7 states: “Protect rural communities from the encroachment of incompatible development”. The General Plan fails to describe or even address what “incompatible development” in rural communities looks like. For the record, “incompatible” residential development in Acton is any residential development having a density in excess of 1

dwelling unit per 2 acres, and “incompatible” non-residential development is any commercial or industrial development that significantly increases local traffic patterns, expands infrastructure, or has a density, intensity, or FAR pattern that exceeds the established profile surrounding the development. This non-specific policy has no strength, depth or breadth, and it lacks all the elements necessary to actually protect rural communities from “incompatible development”. This term should be defined in such a way that precludes high density, high intensity, or high traffic development in rural communities such as Acton that wish to remain rural in future.

25. Land Use Element Policy LU 6.9 states “Encourage development in rural areas that is compatible with rural community character, preserves open space, conserves agricultural land, and promotes efficiencies in services and infrastructure.” The problem with this policy is that development which “promotes efficiencies in services and infrastructure” is, by definition, compact and dense, and therefore contrary to the low density, low intensity profile of rural communities. This Policy MUST be revised: “Encourage low density, low intensity development in rural areas that is compatible with rural community character, preserves open space, and conserves agricultural land, ~~and promotes efficiencies in services and infrastructure.~~”

26. Land Use Element Policy LU 8.2 states “Encourage patterns of development, such as sidewalks and bikeways that promote physical activity.” The use of sidewalks is specifically contrary to Acton’s rural/equestrian profile and Community Standards District, which calls for street plans with inverted shoulder construction and no sidewalks. As written, this land use policy conflicts with the rural developments that exists throughout most of the Planning Area, thus it should be revised accordingly.

27. Land Use Policy LU 9.7 seeks to promote “continuity along commercial corridors with transit or active pedestrian activities.” What precisely does this policy mean? How precisely will it be implemented in rural equestrian communities such as Acton?

28. Land Use Element Policy LU 9.13 states: “Discourage flag lot subdivisions unless designed to be compatible with the existing neighborhood character”. What is wrong with flag lot subdivisions, particularly in rural hillside communities like Acton? Why are they explicitly targeted for elimination? Flag lots are an effective way to preserve hillside areas and, at the same time, comply with Acton’s 2 acre minimum lot size. It is also an effective alternative to “clustering”, which the community of Acton has actively opposed for the last 10 years. The fact that this draft policy includes a “workaround provision” which allows flag lots if they are compatible with existing neighborhood character is of no consequence, since DRP planning staff automatically discount and routinely ignore such provisions when reviewing small subdivision plans. It is unacceptable for the general plan to simply prohibit this subdivision design tool which is important in rural communities such as Acton without a very compelling reason.

29. Land Use Element Policy LU 10.2 states “Support the design of developments that provide substantial tree canopy cover, and utilize light colored paving materials and reflective roofing materials to reduce the urban heat island effect.” As stated clearly above, specular and highly reflective roofing materials are ***the worst possible choice*** within the community of Acton. This fact is undisputed, and it should compel regional planning to revise this policy accordingly.

30. Land Use Element Policy LU 10.6 states: “Ensure that subdivisions in VHFHSZs site open space to minimize fire risks from flammable vegetation”. Generally speaking, open space areas created by future subdivisions in VHFHSZs will be located in areas that are covered in native vegetation which is often quite flammable. Indeed, it is precisely the flammable nature of this vegetation which creates the VHFHSZ in the first place. The only way to actually “minimize” fire risks from flammable native vegetation in open space areas in VHFHSZs would be to remove such vegetation which, of course, is contrary to native vegetation protection policies. This policy simply cannot be implemented and should therefore be removed or revised.

31. Land Use Element Policy LU 10.7 states “Encourage the use of density controlled design techniques to conserve natural resource areas.” As written, this policy (which advocates “clustered” land developments) is unacceptable to Acton for reasons mentioned previously. At a minimum, it must be revised to secure absolute conformance with community standards pertaining to minimum lot size requirements.

32. Page 93 states: “Figure 7.2 is a map of the Highways and Freeways System that serves Los Angeles County.” This statement is inaccurate because Figure 7.2 maps only those state highways/freeways that are maintained by CalTrans; it does not depict any of the “Major Highways” that serve Acton, including Sierra Highway, Soledad Canyon Road, and the Angeles Forest Highway. This statement should be revised as follows: “Figure 7.2 is a map of the State Highways and Freeways System that serves Los Angeles County”.

33. On Page 94, the following description is found: “Limited secondary highways are located in remote foothill, mountain and canyon areas.” This description is offensive because Acton (which has several limited secondary highways) is NOT a remote area; it is in fact a designated rural community that is located between two major urbanized regions. This description must be changed as follows: “Limited secondary highways are located in rural communities and remote foothill, mountain and canyon areas”.

34. Page 96 states: “Although DPW utilizes the above described LOS criteria for assessing the performance of, and determining impacts to, roadways, DPW is currently working on the development of a multimodal transportation planning function. This effort will ensure that transportation facilities are planned, designed, and maintained to provide safe and efficient mobility for all users, including bicyclists, pedestrians, and motor vehicles.” The scope of transportation modes described here as part of DPW’s “multimodal transportation planning function” must be broadened to take into consideration equestrian uses that are crucial to Acton. Both the County Code and the State Vehicle Code classify horses as vehicles, and for this reason, DPW has continually and persistently contended that equestrian use of pedestrian areas in Acton is a violation of law. Yet, at the same time, DPW insists that equestrian use of the roadway itself is not appropriate or authorized. To ensure this conflict is properly addressed by the Draft General Plan, this section must be revised to include equestrian uses in the list of transportation issues that will be addressed by DPW’s “multimodal transportation planning function”.

35. Please make the following revisions to page 98: “Historically, transportation planning and street design have focused on the automobile, resulting in hostile environments for pedestrians,

equestrians, and bicyclists. In order to create safer places to walk, ride and bicycle, as well as to take transit, more emphasis needs to be placed on these other viable modes of transportation. Furthermore, street designs should accommodate all users, including children, seniors, and the disabled. Streets designed to incorporate all potential users, including pedestrians, equestrians, bicyclists, transit users, and conventional vehicular traffic are known as complete streets. Aesthetics and function are also important considerations when creating comfortable places to walk, ride, bicycle, and take transit.”

36. Section 2 “Creating a Multimodal Transportation System” (on page 99) should be expanded to address equestrian issues.

37. Section 3 “Connecting Transportation and Land Use Planning” (beginning on page 99) should be expanded to address equestrian mobility issues to ensure all land use decisions in Acton account for equestrian uses, including the development of feeder trails and backbone trails.

38. Mobility Element Policy M 2.1 should be revised as follows: “Design streets that accommodate pedestrians, equestrians and bicyclists, and reduce motor vehicle accidents through a context-sensitive process that addresses the unique characteristics of urban, suburban, equestrian and rural communities”.

39. Mobility Element Policy M 2.7 should be revised as follows: “Require sidewalks, trails and bikeways to accommodate the existing and projected volume of pedestrian, equestrian and bicycle activity, considering both the paved width and the unobstructed width available for walking.”

40. Mobility Element Policy M 2.8 should be revised as follows: “Connect trails and pedestrian and bicycle paths to schools, public transportation, major employment centers, shopping centers, government buildings, residential neighborhoods, and other destinations.

41. Mobility Element Policy M 2.11 should be revised as follows: “In urban and suburban areas, promote the continuity of streets and sidewalks through design features, such as limiting mid-block curb cuts, encouraging access through side streets or alleys, and promoting shorter block lengths.” . This recommendation is based on the fact that the traditional street design features described in M2.11 such as sidewalks and streetlights are opposed in rural communities and are in fact contrary to the Acton CSD.

42. Mobility Element Policy M 4.5 should be revised as follows: “Where feasible, encourage continuous, direct routes through a connected system of streets, with small blocks and minimal dead ends (cul-de-sacs).” This policy is infeasible in several areas of Acton.

43. Mobility Element Policy M 5.4 should be revised as follows: “Support and pursue funding for the construction, maintenance and improvement of roadway, public transit, pedestrian, equestrian, and bicycle transportation systems”.

44. Mobility Element Policy M 7.5 states “In rural areas, require rural highway and street standards that minimize the width of paving and the placement of curbs, gutters, sidewalks, street lighting, and traffic signals, except where necessary for public safety”. The problem with this policy is that it will not successfully protect rural communities such as Acton from inappropriate infrastructure such as curbs, gutters, sidewalks, and streetlights. The fact is, DPW routinely and persistently requires this infrastructure in Acton without any actual showing that it is “necessary for public safety”. DPW merely declares that it is, and then requires it to be installed. This policy should be revised to prevent DPW from making such peremptory decisions regarding “necessary street improvements” without first showing that such improvements are indeed “necessary”. The following language is recommended: “In rural areas, require rural highway and street standards that minimize the width of paving and the placement of curbs, gutters, sidewalks, street lighting, and traffic signals, except where an engineering study clearly demonstrates that such curbs, sidewalks, and street lighting are indeed necessary for public safety”.

45. Air Quality Element Policy AQ 3.5 states: “Encourage maximum amounts of energy conservation in new development and municipal operations”. What exactly is “maximum amounts of energy conservation”? Is it really appropriate to pursue “maximum amounts of energy conservation” without regard for cost or impact? For instance, as written, this policy compels the county to deny a permit for any residential construction project that fails to fully offset its entire energy footprint via solar panels merely because such offsets are theoretically possible. This policy should be revised as follows: “Policy AQ 3.5: Encourage ~~maximum amounts of~~ energy conservation in new development and municipal operations.”

46. Conservation and Natural Resource Element Policy C/NR 3.10 states: “Require that development mitigate ‘in-kind’ for unavoidable impacts on biologically sensitive areas—onsite or nearby as feasible, but allow flexible off-site application to the benefit of other County SEAs or connectivity among them if onsite is not feasible, and permanently preserve mitigation sites.” What exactly is meant by “in-kind” mitigation? Does it mean that a 4,000 square foot residential development on a 20 acre lot within an Acton SEA must be mitigated by the dedication of 4,000 square feet of the same lot to “open space” preservation? Or does it mean mitigation by the dedication of a separate 20 acre parcel to “open space” preservation? Or will property owners just be able to pay into a fund that banks mitigation fees that are intended for open space acquisition purposes? For the record, SCE had destroyed hundreds of acres within the proposed “Santa Clara River SEA” without any “in-kind” mitigation.

47. Conservation and Natural Resource Element Policy C/NR 3.11 states: “Discourage new development from increasing the urban-wildland interface in undisturbed natural areas through compact design”. Precisely what portions of Acton are considered to be “the urban-wildland interface” where compact design will be implemented?. Compact design is not a policy that is supported by the community of Acton because it has been inappropriately and continually used by DRP to approve subdivisions that do not meet Acton’s 2-acre minimum lot size requirement.

48. Conservation and Natural Resource Element Policy C/NR 5.6 states: “Minimize point and non-point source water pollution”. How does the County intent to implement this policy vis a vis new residential septic systems in Acton?

49. Figure 9.6 superposes an assumed “county windspeed” profile onto a mineral, oil and gas resource map. This figure is both clumsy and fails to consider current renewable energy generation trends:

- a. “Wind” is not a legitimate natural resource, and it is not an important renewable energy source, either. Of the 150 new generation sources that have applied for connection to the California grid in the last 4 years, only 5 are wind projects [Pgs 2-5 of the “CAISO Generation Queue” at <http://www.caiso.com/Documents/ISOGeneratorInterconnectionQueue.pdf>]. Of the 71 generation projects that have been completed since 1999, only 13 are wind projects [Pgs 6-7]. Nearly 100 wind energy projects proposed for connection to the California grid have been cancelled/withdrawn since 2006. Clearly, “wind” is not a resource in Los Angeles County, and DRP’s attempt to show otherwise (by including windspeed profiles in Figure 9.6) is unsupported by the facts.
- b. Given the fact that solar generation is much more widespread and has a much higher generation potential than wind, it is very odd that wind is emphasized in Figure 9.6, and solar is completely ignored.
- c. Within Acton, utility-scale wind generation projects could only be viable if they are placed along the scenic hillside and ridgelines of this community. Such construction violates the hillside and ridgeline preservation provisions of the Acton CSD. Yet, incredibly, Figure 9.6 depicts these areas as “natural resource areas” that should be exploited for energy generation purposes.
- d. The high speed wind “resource” areas depicted in Figure 9.6 are all located in and along steep hillsides which are supposedly inappropriate development areas. DRP cannot and should not tell wind developers that hillside construction is appropriate, and at the same time, tell private property owners that hill side construction is inappropriate.

50. Conservation and Natural Resource Element Policy C/NR 12.1 states “Expand the production and use of renewable energy resources”. This statement is particularly troublesome because it advocates the unfettered expansion of renewable energy production without regard for the significant and deleterious impacts that such projects create. Even small (100 MW) renewable energy projects require the clearance of more than 1,000 acres of open space habitat, and they often cause significant visual (even blindingly bright) impacts not to mention excessive water demand. The only type of renewable energy production that should be actively supported without limit is the expansion of photovoltaic generation on existing structures in developed areas. There is sufficient roofspace in the greater Los Angeles area to accommodate urban electrical demand via in-situ generation. This policy MUST be revised to strongly encourage the installation of photovoltaics on existing structures in developed areas and strongly discourage renewable energy projects on undeveloped open space areas.

51. Has the county considered designating the 14 freeway in Acton and Agua Dulce as a scenic highway? If so, what happened? It seems that if the section of the 5 freeway north of the 14 freeway transition qualifies, then the 14 freeway should qualify as well.

52. Many of the ridgelines in Agua Dulce are designated as “significant ridgelines” in Figure 9.8. Why are there no “significant ridgelines” designated in the community of Acton? There are certainly several ridgelines which meet the criteria identified on page 152 of the Draft General Plan.

53. Parks and Recreation Element Policy P/R 3.3 (which seeks the expansion of lighting districts in subdivisions) is in conflict with Acton’s goal to minimize “light pollution”. Streetlights are strongly discouraged in Acton and many other rural communities, and if they are constructed, they must be fully shielded. This policy must be revised to ensure that it is not improperly applied to subdivisions where streetlighting is actively discouraged.

54. Parks and Recreation Element Policy P/R 4.3 is deficient because it lacks any definitive language regarding how feeder trails will be secured. It must be strengthened to ensure that feeder trail dedications and offers to dedicate are properly secured through the subdivision **and** the land development processes. DRP is reminded that the Acton CSD specifically requires that trails be developed in every land division in Acton. If the county can obtain park land through the subdivision process via the Quimby act, and it can require LLADs as part of the subdivision process and land development process (see Policy P/R 3.3), then it can secure feeder trails for Acton in the same manner.

55. Acton anticipates that, when it is released, the noise contour map (Fig 11.2) will address the significant noise coming from high voltage power lines and substations; this is a significant noise source in the community of Acton.

56. Noise Element Policy N 1.10 states: “Orient residential units away from major noise sources (in conjunction with applicable building codes). Where feasible, exterior walls should have minimal surface openings (i.e. windows, balconies, sliding doors, etc.) not to exceed 10% of the total wall surface”. This requirement is far too stringent, and it should only be implemented in areas with significant (>50 dB) ambient noise levels. Most areas in Acton do not have significant ambient noise levels, so Acton property owners should not have such a significant restriction placed on them. Moreover, limiting the total surface area openings in a residence to only 10% creates dark interior spaces and prevents homeowners from obtaining full benefit of passive solar design options. It also unduly restricts a homeowner’s viewshed by limiting the location and orientation of the windows in the home. Finally, it must be pointed out that this policy is unnecessary, since modern window and door construction methods can eliminate virtually all exterior sound impacts.

57. Safety Element Policy S 3.1 “discourages” development in very high fire hazard severity zones (VHFHSZ). The entire community of Acton is in a VHFHSZ. Specifically in what way will this “discouragement” occur in Acton and how will it affect Acton land owners?

58. Public Services and Facilities Element Policy PS/F 2.1 states “Implement water conservation measures, such as drought tolerant landscaping and restrictions on water used for landscaping.” This policy is not discussed or even alluded to anywhere in the entire Public Services and Facilities Element; it simply appears without any supplemental information. Does this policy apply to new developments or existing? Does it apply to property owners on private wells that do not use

municipal water systems? This policy will significantly impact tens of thousands of property owners if it requires the removal and replacement of existing landscapes. This policy should be discussed in detail in the General Plan, and if such discussion is not provided, it should be deleted.

59. Why isn't the Acton-Agua Dulce Library included as a "Library Site" in Figure 13.2?

60. Public Services and Facilities Element Policy PS/F 6.6 should be revised as follows: "Require electrical distribution lines to be constructed underground. Encourage the construction of electrical transmission utilities underground, where feasible." Placing electrical distribution lines underground will significantly reduce fire risks, particularly in VHFHSZs. It will also reduce the severity of vehicular accidents along rural highways and roads.

61. Economic Development Element Policy ED 4.4 should be revised as follows: "Incentivize urban and suburban infill development that revitalizes underutilized commercial and industrial areas." Such incentives are not appropriate for rural communities which, by definition, have dispersed, low density commercial development that, from an urban perspective, is intrinsically "underutilized".

62. Economic Development Element Policy ED 4.6 should be revised as follows: "Retrofit and reuse vacant and underutilized industrial and commercial sites in urban and suburban areas for emerging and targeted industries". This policy is inappropriate for rural communities for reasons mentioned above (Item 61).

63. Page 136 states "In rural areas, hundreds of households depend solely on private wells that tap into local ground water sources". This statement is problematic because water extracted from private wells is NOT deemed to come from a "local" source, it comes from a privately-owned "point source". To be clear, private well owners extract privately owned water from privately owned "point sources" which occur on and under their privately owned land. Secondly, this statement significantly understates the number of households that depend on private wells.

64. Program #P/R-2 on Page 261 should be expanded to include a provision for obtaining feeder trail dedications or offers to dedicate from subdivision and development projects in rural equestrian communities to ensure trail connectivity.