



February 21, 2014

VIA ELECTRONIC MAIL

Esther L. Valadez, Chair
Regional Planning Commission
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

**RE: Item 6, General Plan Update, General Plan Framework, Land Use, Mobility
(February 26, 2014)**

Dear Chairperson Valadez and Members of the Commission:

The Endangered Habitats League (EHL) appreciates the opportunity to provide written testimony on this item. For your reference, EHL is Southern California's only regional conservation group. We have been stakeholders in large-scale habitat plans and/or general plan updates in Riverside, Orange, and San Diego Counties.

As you consider the framework for land use, we urge that land use designations—and the densities therein—fully reflect infrastructure, public safety, and environmental constraints. It costs the taxpayer to provide services, utilities, roads, and police and fire protection to more remote locations. Often, such areas have high wildlife values, including but not limited to Significant Ecological Areas (SEAs).

Therefore, outside of urban centers, densities should be Rural, preferably at the RL40 category but at RL20 or RL10 where existing patterns of parcelization preclude the lowest density category¹. Estate and ranchette designations (H2, R1, R2, and R5) do not support agricultural uses and are the epitome of unwise, inefficient, auto and GHG-intensive, and land-consumptive land use. Such categories should only be used when existing parcelization has already converted an area to “rural sprawl.”

By down-planning estate densities to rural categories, the County of San Diego found billions of dollars in taxpayer savings² and will avoid putting life and property at

¹ The unique circumstance of the Tejon Ranch Land-Use and Conservation Agreement should be considered as justification for an exemption to an RL designation because the Agreement effectively concentrates urban development on a small portion of its holdings, facilitating conservation over vast areas.

² The San Diego County General Plan Update EIR found savings of \$1.6 billion in road construction costs alone, irrespective of ongoing maintenance. Also see http://www.sdcountry.ca.gov/pds/docs/bos_may03_report.pdf at page 21, Public Costs, for comparison of municipal vs unincorporated service costs.

risk of wildfire. Los Angeles County should follow suit, and instead focus growth at higher densities in appropriate locations.

Unless RL40 (or RL20 or RL10) are applied in SEAs, it will be impossible for the County to successfully implement the SEA Ordinance and achieve biological goals for these unique regions. As a vital and complementary land use tool, we also strongly urge your Commission to implement mandatory “clustering” at Rural densities. Once lot size is decoupled from density, substantial open space and agricultural benefits accrue. The County of San Diego Conservation Subdivision Program provides an off-the-shelf model³.

In conclusion, without use of low RL densities and without clustering, protecting SEAs and rural and agricultural values will prove impossible.

Thank you for considering our views.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Silver", is centered on a light gray rectangular background.

Dan Silver, MD
Executive Director

cc: Richard Bruckner, Director

³ For CSP, see <<http://www.sdcounty.ca.gov/pds/advance/conservationsubdivision.html>>.