

## Leon Freeman

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**From:** Jacki Ayer [airspecial@aol.com]  
**Sent:** Tuesday, February 25, 2014 2:56 PM  
**To:** DRP General Plan Project  
**Cc:** tuckertwo@hughes.net; Katherine.Tucker@ngc.com; m\_r\_hughes@earthlink.net; rjactontowncncl@aol.com; blumranch@aol.com; thorx655@earthlink.net  
**Subject:** Re: Comments on the Draft General Plan  
**Attachments:** additional comments on the revised draft general plan.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Connie;

Please accept the attached.

Sincerely

Jacqueline Ayer

-----Original Message-----

**From:** DRP General Plan Project <D1277d5@planning.lacounty.gov>  
**To:** Jacki Ayer <airspecial@aol.com>; DRP General Plan Project <D1277d5@planning.lacounty.gov>  
**Cc:** tuckertwo <tuckertwo@hughes.net>; Katherine.Tucker <Katherine.Tucker@ngc.com>; m\_r\_hughes <m\_r\_hughes@earthlink.net>; rjactontowncncl <rjactontowncncl@aol.com>; blumranch <blumranch@aol.com>; thorx655 <thorx655@earthlink.net>  
**Sent:** Mon, Feb 24, 2014 8:54 am  
**Subject:** RE: Comments on the Draft General Plan

Hi, Jacki.

Thank you for your thoughtful and comprehensive comments. We provided the Regional Planning Commission with a follow up memo last week, which includes recommended edits to Parts I and II, and the Land Use and Mobility Elements. Here is a link to that memo (and attachments, which includes your letter):

[http://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_staff-report-20140220.pdf](http://planning.lacounty.gov/assets/upl/project/gp_2035_staff-report-20140220.pdf)  
[http://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_staff-report-attachments-20140220.pdf](http://planning.lacounty.gov/assets/upl/project/gp_2035_staff-report-attachments-20140220.pdf)

Please let me know if you have any questions or additional comments. I am also available to discuss your comments further- please let me know. Thanks!

All the best,

Connie

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**From:** Jacki Ayer [<mailto:airspecial@aol.com>]  
**Sent:** Wednesday, February 19, 2014 11:06 AM  
**To:** DRP General Plan Project  
**Cc:** [tuckertwo@hughes.net](mailto:tuckertwo@hughes.net); [Katherine.Tucker@ngc.com](mailto:Katherine.Tucker@ngc.com); [m\\_r\\_hughes@earthlink.net](mailto:m_r_hughes@earthlink.net); [rjactontowncncl@aol.com](mailto:rjactontowncncl@aol.com); [blumranch@aol.com](mailto:blumranch@aol.com); [thorx655@earthlink.net](mailto:thorx655@earthlink.net)  
**Subject:** Comments on the Draft General Plan

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](mailto:AirSpecial@aol.com) if you have any questions or comments.

Sincerely  
Jacqueline Ayer  
Acton resident

Dear Connie;

Please accept the following comments on Attachments 1 and 2 that you provided yesterday. The comments are presented in order of the page numbers indicated. I have not finished reviewing the remaining attachments, and it is possible that I will have further comments. However, given the propinquity of the RPC hearing, I thought it best to get this to you as quickly as possible. I also want to point out that I have not had the time to carefully edit this letter, so there may be some typos!

Sincerely

Jacqueline Ayer

Page 16, paragraph 3 I appreciate that the revision now limits transit oriented development to urban areas. However, it is not clear that the “active corridor developments” described in the revision are also limited to urban areas. Specifically, the revision states “Active corridor developments will connect major centers and neighborhoods”. As I previously pointed out, the entire community of Acton is a “corridor” connecting major centers, which makes it a target for the “active corridor development” that is promoted in this provision and is contrary to Acton’s existing rural and equestrian profile. This provision must be further revised to clarify that such “active corridor developments” are constrained to urban and suburban areas.

Page 16, paragraphs 4 and 5 This revision could actually make things worse. The principle espoused in these paragraphs (namely that it is necessary to provide and upgrade public infrastructure) is presented as an overarching tenet that is applicable to all development within the planning area. The problem is that it is an anathema to rural communities, which represent 80% of the developed area that is addressed by the draft General Plan (see table 6.1). To be perfectly clear, rural communities like Acton do not generally want or need “community services and infrastructure”. New developments in rural communities like Acton already support schools, libraries and park facilities through development fees paid to the county and, presumably, the County acts responsibly with these funds. If a rural community determines that additional facilities are needed, it comes together and finds a way to pay for them through a variety of funding mechanisms. Planning staff still fail to recognize that, by and large, the “community services” and “community infrastructure” described in the draft General Plan are the antithesis of rural development. The quality of life in rural communities IS NOT DEPENDENT ON the availability of sewers, flood protection, utilities, cultural facilities, roadway networks, community gathering places, or open spaces. More to the point, the draft General Plan’s foundational precept that such facilities are necessary to accommodate future rural growth is utterly contrary to innate “rural” character. The community of Acton has always opposed, and continues to oppose, the construction of flood control infrastructure. In its place, Acton advocates proper neighborhood design that preserves runoff patterns in their existing, natural state and which uses infiltration strategies to prevent increased runoff from development projects. With this approach, “flood protection infrastructure” is avoided, not expanded. Acton does not have, and specifically opposes, sewers and traditional “roadway” networks. Given the low density of development in rural communities, the need for “open space” is not apparent, and even “utilities” are, in certain circumstances, unnecessary. Rural communities come ready made

with an intrinsic “cultural ethos” stemming from their historical origins, and the “cultural resources” referred to in the draft General Plan (such as art museums, theaters, etc) are eschewed.

Page 17 paragraph 6. The revised General Plan states: “The General Plan addresses environmental justice by providing information and raising awareness to a number of issues that impact the unincorporated areas, including but not limited to excessive noise, water pollution, air pollution, and heavy industrial uses”. First of all, environmental justice is NOT addressed by merely “providing information and raising awareness” regarding issues such as noise, traffic, and litter impacts (traffic and litter are indeed issues that should be listed here, but it are not). “Environmental justice” is addressed by taking active steps to prevent such impacts on rural communities to the greatest extent feasible. To properly address “environmental justice” in rural communities, the General Plan must set forth clear policies and goals that specifically state how such impacts will be limited; a General Plan that merely relies on “providing information” and “raising awareness” to as a means of addressing “environmental justice” is a deficient General Plan. To be clear, the County does not need to “raise” Acton’s awareness about noise, traffic and litter impacts within our community. Rather, the county needs to prevent such impacts in the first place by ensuring that non-residential development in Acton is limited to low intensity, community serving uses and residential development is constrained to low densities only.

Page 17 paragraph 6 (continued) This provision further states “The General Plan emphasizes the importance of sufficient services and infrastructure, ...” It is precisely this emphasis that is the problem; to properly preserve and protect rural communities (comprising 80% of the General Plan’s developed planning area) “infrastructure development” must be specifically discouraged and constrained.

Page 69, paragraph 2: I am grateful that the recommendation I made pertaining to transit-oriented development was incorporated in the revised draft General Plan. However, reading it again, I realize that it still does not constrain transit-oriented development to urban and suburban areas; it only clarifies that urban and suburban areas have the highest potential for infill development. Therefore, I recommend the following: “Transit-oriented development is well-suited for higher density housing and mixed uses in urban and suburban areas with nodes, commercial, employment, and civic activities. Transit-oriented development in urban and suburban areas connects neighborhoods, and community and employment centers through a broad network of pedestrian, bicycle, transit, and roadway facilities.”

Page 70: “The impacts of sprawl”: Based on the definition of “sprawl” provided in the revised draft General Plan, it appears that “sprawl” development is synonymous with “rural” development. What is the difference? If there is no difference, then this section of the draft General Plan is specifically denigrating and disparaging a land use pattern that is supposedly “protected” by other sections of the draft General Plan (and which comprises 80% of the developed portion of the “planning area” that it addresses).

Page 71, paragraph 2 should be revised as follows: “The placement, configuration, and distribution of land uses has a significant impact on a community’s quality of life. For example, residential uses ~~could~~

be are usually impacted by noise, traffic and odor from adjacent commercial or heavy industrial uses.”

Page 72: Thank you for revising the discussion of community design elements to include the rural profile.

Page 73 addressing “Sustainable Development”: Thank you for addressing the reflective roof issue. However, Density Controlled Design is still an anathema to rural communities. The Density Controlled Design discussion must be revised to include language which ensures that density controlled designs will create lots that comply with the minimum size standard established for property by the underlying land use designation.

Page 84: Thank you for clarifying that Policy LU 4.3 applies to urban and suburban areas. However, policy LU 4.4 must also be revised to ensure that it is applied only to urban and suburban commercial corridors.

Page 86: Thank you for revising Policy LU 6.7 and policy LU 6.9. However, I am still concerned that the draft General Plan does not provide any indication of what “incompatible development” is or what it looks like in rural areas. It is crucial that the General Plan specify, in very plain and didactic language, what rural development is and, (importantly) what it is not. Traffic is a crucial element in determining whether a commercial, industrial, or residential development is compatible with existing rural surroundings. This is particularly true in Acton, where visitor-serving non-residential developments that rely on freeway and highway customers (and are therefore not intrinsically neighborhood serving) can (and will) cause significant traffic problems. Commercial developments on lands adjacent to Acton’s High Desert Middle School are of particular concern, because such developments pose clear traffic safety hazards that cannot be mitigated. The reason that I am emphasizing this issue in particular is because the current version of the proposed “Town and Country” Plan has nearly tripled the quantity of commercially designated land surrounding Acton’s middle school. In its current form, the General Plan does not contain the language necessary to constrain commercial development on these lands in a manner that limits traffic and other hazards. Therefore, it is deficient. Please note that these comments are also germane to the issues I raised previously (and which were ignored in the revised version of the General Plan) pertaining to the perfunctory FAR designation for rural commercial land uses.