Los Angeles
World Airports

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February 26, 2014

Esther Valadez, Chair
Regional Planning Commission
Los Angeles County
Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012

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Dear Chair Valadez,

Los Angeles World Airports (LAWA) is thankful for the meetings and cooperative relationship we have had with Department of Regional Planning staff. We are glad to offer the following comments in regards to the County of Los Angeles proposed General Plan Update, the Antelope Valley Plan Area Update, the Renewable Energy Ordinance, and the Significant Environmental Area Ordinance (SEA). These comments reiterate those made to staff and we remain confident that we can collectively find solutions that address all our concerns. LAWA is a proprietary department of the City of Los Angeles that owns and operates Los Angeles International Airport, LA/Ontario International Airport, Van Nuys Airport, and has future plans to develop Palmdale Regional Airport (PMD).

General Plan Update

LAWA remains agnostic in terms of the changes proposed outside its properties. Consistent with regional planning documents and stakeholder consensus LAWA has consistently pursued the long-term development of PMD. LAWA will continue to pursue this vision but must caution that potential downzoning, enlargement of SEAs, and other land use restrictions presently contemplated by County DRP may have an indirect effect of reduction in demand for a future airport in the Antelope Valley.

Major infrastructure improvements to increase access to the Palmdale Airport, such as the Caltrans/Metro High Desert Corridor are also essential to airport development and should be reflected in the General Plan. It is important to state that the current jobs and population statistics do not justify profitable commercial air service and the fact that under any scenario LAWA will maintain a need for interim uses that will provide economic benefit from LAWA's Palmdale land holdings. LAWA believes the General Plan and Area plan can work together to facilitate both interim and long-term uses at PMD.

Antelope Valley Area Plan Update

The Antelope Valley Area Plan's current and proposed zoning is inconsistent across LAWA's Palmdale property. As you know, LAWA has long range plans to use the entire property for a future regional airport and short term interim plans for renewable energy use and other economically productive interim uses. LAWA also maintains existing leases on the

It is unclear how the SEA ordinance relates to master plans or projects that involve multiple entitlements at an early programmatic stage. It is essential to LAWA that once a project is cleared, the entitlement should not lapse or change during the long range 25+ year development timeframe for an airport.

In regards to the proposed SEA map itself, LAWA anticipates that the areas within our land holdings east of the Little Rock Wash (The Wash) may be protected habitat areas in the eventual full development of PMD as a commercial airport. Any SEA designation west of The Wash will have impacts on that future airport feasibility. LAWA will continue to review and comment on the technical details of the proposed maps and habitat types in the coming months.

Where areas are set-aside as mitigation or permanent open-space, a Conservancy or other mechanism must be established to transfer liability and maintenance for the parcel.

Conclusions

It has been LAWA's sincere pleasure to work the County DRP team on these important planning initiatives impacting the Antelope Valley. It is our hope that your multiple plan updates will reflect a unified zoning and land use scheme for the Palmdale Regional Airport property that allows for seamless future airport development as well as economically beneficial interim uses. If you have any questions regarding these comments or if LAWA can provide any information that will be beneficial to your planning efforts, please do not hesitate to contact us at (424) 646-7690.

Thank you,

Christopher Koontz
Chief of Airport Planning I
Environmental and Land Use Section