

Leon Freeman

From: clark Stevens [clark@newwestland.com]
Sent: Wednesday, February 26, 2014 11:59 AM
To: DRP General Plan Project
Cc: Rosi Dagit; John Hendra
Subject: RCDSMM Comments on General Plan
Attachments: 140226 RCDSMM LA CO General Plan comments.pdf

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Dear Ms. Chung

The Resource Conservation District of the Santa Monica Mountains is pleased to provide(attached) our comments on the proposed General Plan Update.

best regards

clark stevens, architect

executive officer, RCDSMM
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3 February 2014

Connie Chung
Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012

Submitted by email to: genplan@planning.lacounty.gov

EXECUTIVE OFFICER
Clark Stevens

RE: Comments on the NOP for the Los Angeles County General Plan

Dear Ms. Chung,

On behalf of the Resource Conservation District of the Santa Monica Mountains (RCDSMM), thank you for the opportunity to submit comments on the NOP for the Los Angeles County General Plan Update. Building upon the comments we submitted in 2011 and July 2013, we would also like the following to be addressed in the EIR for the Plan.

Chapter 3 Guiding Principles

As we noted in our July 2013 comments, this section would benefit from a clearly articulated General Plan Vision.

We appreciate that Sustainability is the underlying unifying principle for the General Plan, however this document provides an opportunity for the County to articulate a vision for the future that explains how all of the various plan elements can interact to achieve an identifiable vision of how LA County will function in 50 years. Clearly articulating this vision would greatly enhance the functionality of the General Plan.

For instance the guiding vision could explain how lessons learned from the implementation of the 1986 Plan has shaped future planning, as well as ways that ecosystem services cost-benefits analysis could be integrated into all aspects of planning. Formal recognition, examination and integration of ecosystem services needs to be a clearly identified fundamental part of the planning process at all levels in order to be successful. The only place we found mention of this important factor was on pg 138 in the sections on the preservation of biotic diversity. Ecosystem services encompass far more than that and the General Plan would benefit from including consideration of these functions in multiple elements.

The plan could also recognize and integrate long term processes into the evaluation of potential impacts to allow for ecological resiliency, which in turn results in greater sustainability. This would require a formal effort to engage in on-going dialog and implementation of up to date information from partner agencies, local scientists, and the public that can be integrated into



adaptive management of the planning process.

The uncertainty faced by the County regarding effects of water and energy availability, as well as climate changes between now and 2035 are difficult to project, but we can anticipate that they could potentially reset the underlying paradigms that currently shape our planning. Explicitly recognizing this uncertainty and developing a programmatic way to respond will enable the County to better achieve the goals and policies identified in the General Plan.

Chapter 6 Land Use Element

While the General Plan outlines specific goals and policies, it is also an opportunity for public education. We recommend adding to the descriptive narrative introduction the role that careful stewardship of environmental services provides in terms of long-term benefits.

It should be recognized that some areas are too hazardous, and/or environmentally sensitive for development. The County needs to articulate a goal that identifies those issues and specifically direct development into less hazardous locations.

The Land use compatibility narrative should also consider impacts to open space from fuel modification, type conversion from native habitats to agriculture, etc.

We recommend addition of a policy to Goal LU 8; Well-designed and healthy places that support a diversity of built environments that promotes infrastructure services (energy, water, sewer, trash, etc.) to be localized to reduce transportation costs and provide local, sustainable services that would avoid impact problems associated with establishing centralized infrastructures distant from the point of service, as with imported water or with remote solar farms converting native habitat to hardscape.

A policy should be added to Goal LU 10: Subdivision that utilizes sustainable design techniques that recommends preventing habitat fragmentation, retention of storm water, localized production of appropriate energy, water conservation and reuse.

Chapter 8: Air Quality Element

Responding to climate change section (pg 119) needs to explicitly recognize the important contribution of native vegetation and protection of functional ecosystems as an important way of mitigating climate change impacts. Preserving existing woodlands and scrublands can be more cost effective than planting new, and the only certain way to prevent functional habitat loss. The plan should identify degraded habitat areas where targeted restoration could also serve as carbon sequestration mitigation bank.

We are concerned by the elimination of Goal AQ 4: energy efficiency and conservation through development and design techniques that was presented in the May 2012 version of the document. The policies provided under that goal were important.



We recommend re-instating that goal and its associated policies. We also suggest adding a policy to AQ4 that specifically addresses the need to preserve existing natural habitats and vegetation as a way of reducing and mitigating for air pollution. Natural plant communities, especially our woodlands and forests contribute significant ecosystem service benefits that are extremely costly to replicate once they are gone.

Chapter 9: Conservation and Natural Resources Element

On page 129, it states that there is no coordinated master plan to acquire, manage and preserve open space in the County. How are private open space easements tracked and monitored?

We agree that a coordinated open space master plan is needed. This could be added as a policy to Goal C/NR 2.

We also recommend adding another policy to Goal C/NR 2 to address the on-going conflicts related to development adjacent to existing public open space. Maintaining adequate buffers between private and public lands for fuel modification and other practices is critical. This is indirectly suggested in Goal C/NR3 Policy 3.11, but a direct policy statement would avoid confusion.

It is important to identify and call out dark sky role as important resource, as consistent with the current County Dark Sky Ordinance. Regulation of night lighting and providing places where residents can see the stars is a key element of open space preservation.

Biological Resources:

The text box on page 140 should reflect adoption of Part 1 of the Oak Woodlands Conservation Management Plan in August 2011 and the pending release of the Guidelines documents. The RCD is appreciative of the inclusion of this in the General Plan Update.

Marine Protected Areas information should be added to the Areas of Special Biological Significance section on pg. 148.

Agriculture

Vineyards are not identified as a commodity in Table 9.6 (pg 156) and if not counted as field crops, should be added.

As part of Goal C/NR 9 Sustainable agricultural practices, a policy is needed that examines agricultural resource areas and correlate these with remaining native vegetation communities to identify and track impacts and reduce loss and conversion of native vegetation to agricultural uses.

Mineral and Energy Resources

We support Policy C/NR 11.4: Require that mineral resource extraction and production operations be conducted to protect other natural resources and prevent excessive grading in hillside areas.



We recommend that policy C/NR 12.1 also prioritize using local sources of energy co-located with existing infrastructure to reduce environmental impacts. For example, installing solar panels on existing roofs and parking lots could provide local power, and if implemented properly could also reduce temperatures in massive parking lots, which in turn reduces evapotranspiration of gas in cars as well as improves shade tree potential growth.

We also recommend adding a policy that specifically addresses fracking and its associated environmental impacts.

Scenic Resources

In addition to the official state highways listed in Table 9.8, other highways throughout the County provide significant vistas. A policy advocating additional potential scenic highway designations to protect other important transportation corridor vistas should be considered.

We appreciate the policies outlined to support Goal C/NR 13 to protect visual and scenic resources.

Historical, Cultural and Archeological Resources

On pg. 173, a statement should be added to the text of the Land Use Compatibility section that recognizes the interrelationship between the landscape configuration and these anthropogenic resources. Often a historic or cultural site would not be so without the surrounding environmental conditions.

Chapter 10: Parks and Recreation Element

We support the effort to identify small, county owned areas in more densely populated areas that could be restored as parks, local community gardens and open space for local residents.

Chapter 12: Safety Element

The plan should set the stage for zoning in areas with identified geologic, seismic, flood, fire or other natural hazards should be reassigned to open space or lowest possible density use to reduce costs associated with extending development into harms way.

For instance, the language in Policy S.1.2 only requires that geotechnical studies be completed, but does not provide guidance on what level of risk would be acceptable.

We appreciate the goals and policies outlined for Flood and Fire Hazards.

Chapter 13: Public Services and Facilities Element

We agree that there is a need to effectively track development, and recommend that a review of the policies versus built reality of the 1986 plan be evaluated to identify ways to avoid making the same mistakes, provide insight into what worked or did not work, and set the stage for careful monitoring and development of benchmark metrics to provide annual evaluation of proposed goals and policies.



We suggest adding a policy to Goal PS/F 1 that clearly requires evaluation of existing ecosystem service functions as part of the evaluation of public facilities.

Drinking Water:

With only 33% of water supply local, and the long-term implications of state wide water availability, conservation and landscape restrictions are critical! Stronger policies restricting use of lawns and other high water use landscaping in both public and private areas is recommended to complement Goal PS/F3.

Wastewater and Sewer

Goal PS/F 4 needs a policy that recognizes the role of onsite septic systems to assist in the reduction of end of pipe pollution and utilize local rather than regional based systems. Establishing maintenance and monitoring programs that can be fairly and equitably be implemented is critical.

Utilities

We recommend adding a policy to Goal PS/F 6 recommending that utility siting be localized and decentralized whenever possible to a) reduce impacts, 2) reduce transmission losses, 3) promote local conservation by connecting users to their systems more directly, 4) reduce system wide malfunctions.

Utility companies should comply with all best management practices and environmental protection standards imposed on private developers.

Chapter 14: Economic Development Element

Given the need for promoting jobs locally, provide an integrated plan that connects jobs more directly to transportation and housing by clustering makes sense.

The Plan should add a goal that formally recognizes that economic growth in LA County is directly tied to our environment - extensive portions of the local economy are tourist driven and reliant upon a functional ecosystem from the beaches to the mountains.

The policies should avoid fostering short-term growth at the expense of long term ecological sustainability and economic value.

Chapter 15: General Plan Maintenance

The requirement for Annual Progress Reports for each of the major Policy elements is a good way to develop an on-going review of policy implementation and effectiveness.

What metrics will be used to evaluate the effectiveness of the goals and policies in the plan?

Finally, we note and support the inclusion of a Transfer of Development Rights programs



(TDRs), and would like to see the timeline for this item accelerated. A TDR program would provide incentive and a market for private land conservation in a period of reduced public funding for conservation purchases. Having this program in place before market development pressure increases further would facilitate the exchange of density from ecologically critical undeveloped private land to preferable locations of development. We recommend that TDRs be linked to Transit Oriented Development areas, so that the recipient areas are not simply added density but are transferred density from ecologically significant lands.

We appreciate the opportunity to provide input and look forward to reviewing the resulting Environmental Impact Report.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Stevens'.

Clark Stevens
Executive Officer