

*Appendix A*  
*2011 Notice of Preparation (NOP) and Responses*

## Appendices

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# NOTICE OF PREPARATION (NOP)

## County of Los Angeles, Department of Regional Planning

**Project Title:** Los Angeles County General Plan Update and Antelope Valley Area Plan Update

**Introduction:** The proposed project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The project will replace the adopted General Plan (excluding the Housing Element, adopted in 2008) and the adopted Antelope Valley Area Plan.

### 1. ENVIRONMENTAL SETTING

#### 1.1 Project Location

Los Angeles County is geographically one of the largest counties in the country with approximately 4,083 square miles. The County stretches along 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange County and San Bernardino County, to the north by Kern County, and to the west by Ventura County. The County also includes two offshore islands, Santa Catalina Island and San Clemente Island, as shown in Figure 1, *Regional Location*. The unincorporated areas account for approximately 65 percent of the total land area of the County.

The unincorporated areas in the northern portion of the County are covered by large amounts of sparsely populated land and include the Angeles National Forest, part of the Los Padres National Forest, and the Mojave Desert. The unincorporated areas in the southern portion of the County consist of 58 noncontiguous land areas, which are often referred to as the County's unincorporated urban islands. The County's governmental structure comprises five Supervisorial Districts with the Los Angeles County Board of Supervisors as the governing body responsible for making all legislative land use decisions for the unincorporated areas. Maps of the Supervisorial Districts and unincorporated areas of the County are available online on the County Department of Regional Planning's website: <http://planning.lacounty.gov/generalplan>.

The Antelope Valley Planning Area is located within Los Angeles County and bounded by Kern County to the north, Ventura County to the west, the Angeles National Forest (inclusive) to the south, and San Bernardino County to the east. It excludes the Cities of Lancaster and Palmdale. This area covers approximately 1,800 square miles and includes over two dozen communities. A map of the Antelope Valley and the immediate vicinity is available online at <http://planning.lacounty.gov/tnc>.

#### 1.2 General Plan and Planning Areas Framework

The Los Angeles County General Plan is the guide for growth and development for the unincorporated areas of Los Angeles County. The General Plan guides the long-term physical development and conservation of the County's land and environment through a framework of goals, policies, and implementation programs. The California Government Code requires that each city and county adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning." Long-range planning provides the opportunity to responsibly manage and direct future development, conserve natural areas, support economic development objectives, and improve mobility in the region.

The Los Angeles County General Plan serves as the framework for existing community-based plans, including Area Plans, Community Plans, Neighborhood Plans, and Local Coastal Land Use Plans. Area Plans provide additional details to General Plan goals and policies, focusing on subregional land use issues and other policy needs that are specific to the Planning Area. Community Plans and Neighborhood Plans cover smaller geographic areas within the Planning Area, and address neighborhood and/or community level land use policy issues. Local Coastal Land Use Plans are components of the Local Coastal Program (LCP), which consist of land use plans, zoning ordinances and maps, and implementing actions to protect coastal resources within the state designated coastal zone. All community-based plans are components of the General Plan and must be consistent with General Plan goals and policies. The following is a list of adopted community-based plans:

#### Area Plans

- Antelope Valley Area Plan (adopted 1986)
- Santa Clarita Valley Area Plan (adopted 1984)
- Santa Monica Mountains North Area Plan (adopted 2000)

#### Community Plans

- Altadena Community Plan (adopted 1986)
- East Los Angeles Community Plan (adopted 1988)
- Hacienda Heights Community Plan (adopted 1978)
- Rowland Heights Community Plan (adopted 1981)
- Twin Lakes Community Plan (adopted 1991)
- Walnut Park Neighborhood Plan (adopted 1987)
- West Athens/Westmont Community Plan (adopted 1990)

#### Local Coastal Land Use Plans

- Marina del Rey Local Coastal Land Use Plan (adopted; certified Local Coastal Program 1996)
- Malibu Local Coastal Land Use Plan (adopted 1986)
- Santa Catalina Island Local Coastal Land Use Plan (adopted; certified Local Coastal Program 1983)

### **1.3 Adopted General Plan**

The County's efforts to prepare a General Plan for the unincorporated areas began in the 1970s with the creation of the Environmental Development Guide. In 1973, the County adopted its first General Plan, followed by a comprehensive update in 1980. The County's adopted General Plan and community based plans can be found online at <http://planning.lacounty.gov/plans/adopted>.

### **1.4 Adopted Antelope Valley Area Plan**

The adopted Antelope Valley Areawide General Plan, which is a component of and works in conjunction with the current General Plan, was adopted by the Los Angeles County Board of Supervisors on December 4, 1986. The proposed Area Plan replaces the previous Antelope Valley Areawide General Plan in its entirety.

## **2. PROJECT DESCRIPTION**

The proposed project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs, and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update and

Antelope Valley Area Plan Update focus growth in the unincorporated areas with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas.

## **2.1 Draft General Plan**

The proposed project is the preparation of a comprehensive update of the County's 1980 General Plan that meets California Code requirements for a general plan. The Draft Los Angeles County General Plan accommodates new housing and jobs within the unincorporated area in anticipation of population growth in the County and the region through the year 2035. The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County's needs without compromising the ability of future generations to realize their economic, social, and environmental goals. The Draft General Plan has been designed to utilize, promote, and implement policies that promote healthy, livable, and sustainable communities. Five guiding principles—Smart Growth; Sufficient Community Services and Infrastructure; Strong and Diversified Economy; Environmental Resource Management; and Healthy, Livable and Equitable Communities—are supported by community-identified goals and stakeholder input, and further the overall goal of sustainability throughout the Draft General Plan.

The Draft General Plan consists of the following elements:

- Land Use Element
- Mobility Element
- Air Quality Element
- Housing Element (adopted and certified 2008)
- Conservation and Open Space Element
- Parks and Recreation Element
- Noise Element
- Safety Element
- Public Services and Facilities Element
- Economic Development Element

To clarify the framework of the General Plan and to facilitate the planning of the unincorporated areas, the Draft General Plan establishes 11 Planning Areas, as shown online at <http://planning.lacounty.gov/generalplan>.

- Antelope Valley Planning Area
- Coastal Islands Planning Area
- East San Gabriel Valley Planning Area
- Gateway Planning Area
- Metro Planning Area
- San Fernando Planning Area
- Santa Clarita Valley Planning Area
- Santa Monica Mountains Planning Area
- South Bay Planning Area
- West San Gabriel Valley Planning Area
- Westside Planning Area

The Draft General Plan provides a framework of goals and policies to achieve countywide planning objectives within the 11 Planning Areas, and serves as the foundation for all existing and future community-based plans. Furthermore, the Draft General Plan involves a revision to the current General Plan land use policy map, and revisions to elements required by the State of California and optional elements. Table 1, *Proposed General Plan*, provides a description of the land uses designations proposed in the Land Use Plan. The following describe the major land use policies in the Draft General Plan, which are supported by goals, policies, programs and strategic changes to the land use policy maps:

**Transit Oriented Districts:** Transit Oriented Districts (TOD) are areas within a 1/2 mile radius from a major transit stop. There are 11 Transit Oriented Districts established by the Draft General Plan. TOD areas are located in proximity to major transit stops, provide the best opportunities for infill development, and are well-suited for higher density housing, mixed uses, and civic activities. The TODs guided the increase of residential densities and the allowance of mixed uses along major corridors in the draft land use policy maps. All TODs are envisioned to have a TOD Station Area Plan with standards, regulations, and capital improvement plans that tailor to the unique characteristics and needs of each community.

**Special Management Areas:** The County's Special Management Areas require additional development regulations that are necessary to prevent the loss of life and property, and to protect the natural environment and important resources. Special Management Areas include but are not limited to Agricultural Resource Areas, Airport Influence Areas, Seismic Hazard Zones, Flood Hazard Zones, Significant Ecological Areas, Hillside Management Areas, and Very High Fire Hazard Severity Zones. The Draft General Plan minimizes risks to hazards and limits development in Special Management Areas through goals, policies and programs. The Draft General Plan also includes the Hazard and Environmental Constraints Model, which is a visual representation of the Special Management Areas and serves 1) as a tool to inform land use policies for future community-based planning initiatives; 2) to inform applicants and planners of potential site constraints and regulations; and 3) to direct land use policies and the development of planning regulations and procedures to address environmental hazards.

**Preservation of Industrial Land:** Planning for future growth and the appropriate land use mix has major impacts on the local and regional economy. The Draft General Plan includes land uses and policies that protect the remaining industrial land in the unincorporated areas. The Draft General Plan identifies Employment Protection Districts, which are economically viable industrial land and employment-rich lands, with policies to prevent the conversion of industrial land to nonindustrial uses.

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
<b>COUNTYWIDE GENERAL PLAN (NOT IN A COMMUNITY PLAN) <sup>2</sup></b>						
<b>PROPOSED GENERAL PLAN</b>	<b>106,632</b>	--	<b>205,305</b>	<b>698,114</b>	<b>583,526</b>	<b>182,410</b>
<b>Commercial</b>	<b>1,143</b>	--	<b>0</b>	<b>0</b>	<b>39,325</b>	<b>55,189</b>
CG - General Commercial	812	0.5 (F)	0	0	17,686	35,548
CM - Major Commercial	331	1.5 (F)	0	0	21,636	19,634
CR - Rural Commercial	0.33	0.25 (F)	0	0	4	7
<b>Industrial</b>	<b>3,566</b>	--	<b>0</b>	<b>0</b>	<b>78,573</b>	<b>64,725</b>
IH - Heavy Industrial	1,702	0.5 (F)	0	0	37,064	28,380
IL - Light Industrial	1,824	0.5 (F)	0	0	39,717	30,411
IO - Industrial Office	41	1 (F)	0	0	1,792	5,935
<b>Mixed Use</b>	<b>247</b>	--	<b>29,583</b>	<b>82,535</b>	<b>16,108</b>	<b>31,522</b>
MU - Mixed Use	247	120 (D) / 1.5 (F)	29,583	82,535	16,108	31,522

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
<b>Open Space</b>	<b>57,531</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,933</b>
OS-BLM - Bureau of Land Management	76	--	0	0	0	0
OS-C - Conservation	7,644	--	0	0	0	0
OS-ML - Military Land	36,615	--	0	0	0	0
OS-MR - Mineral Resources	1,125	--	0	0	0	0
OS-NF - National Forest	2,777	--	0	0	0	0
OS-PR - Parks and Recreation	7,147	--	0	0	0	1,625
OS-W - Water	2,147	--	0	0	0	307
<b>Public / Semi-Public</b>	<b>6,880</b>	--	<b>0</b>	<b>0</b>	<b>449,520</b>	<b>24,167</b>
P - Public and Semi-Public	6,880	1.5 (F)	0	0	449,520	24,167
<b>Rural</b>	<b>16,196</b>	--	<b>2,067</b>	<b>7,958.92</b>	<b>0</b>	<b>101</b>
RL40 - Rural Land 40	38	0.03 (D)	1	4	0	0
RL20 - Rural Land 20	12,767	0.05 (D)	638	2,458	0	0
RL10 - Rural Land 10	2,111	0.1 (D)	211	813	0	0
RL2 - Rural Land 2	126	0.5 (D)	63	243	0	0
RL1 - Rural Land 1	1,154	1 (D)	1,154	4,441	0	101
<b>Residential</b>	<b>21,070</b>	--	<b>173,655</b>	<b>607,620</b>	<b>0</b>	<b>4,774</b>
H2 - Residential 2	1,462	1.6 (D)	2,340	9,007	0	100
H5 - Residential 5	1,773	4 (D)	7,094	27,311	0	100
H9 - Residential 9	14,403	7.2 (D)	103,702	373,326	0	3,086
H18 - Residential 18	2,497	14.4 (D)	35,955	129,439	0	811
H30 - Residential 30	813	24 (D)	19,503	54,414	0	427
H50 - Residential 50	117	40 (D)	4,667	13,022	0	250
H100 - Residential 100	5	80 (D)	395	1,101	0	0
<b>COMMUNITY PLANS<sup>2</sup></b>						
<b>ALTADENA</b>	<b>5,604</b>	--	<b>16,240</b>	<b>61,359</b>	<b>9,996</b>	<b>18,963</b>
<b>Commercial</b>	<b>64</b>	--	<b>0</b>	<b>0</b>	<b>2,784</b>	<b>9,385</b>
GC - General Commercial	64	1 (F)	0	0	2,784	9,385
<b>Industrial</b>	<b>38</b>	--	<b>0</b>	<b>0</b>	<b>1,004</b>	<b>3,075</b>
BP - Business Park	38	0.6 (F)	0	0	1,004	3,075
<b>Infrastructure</b>	<b>815</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Public Streets	815	--	0	0	0	0
<b>Mixed Use &amp; Specific Plan</b>	<b>255</b>	--	<b>904</b>	<b>2,800</b>	<b>2,226</b>	<b>4,561</b>
MU - Mixed Use "Center"	37	17.6 (D) / 1.4 (F)	642	1,792	2,226	4,411
SP - La Vina Specific Plan	219	--	262	1,008	0	150
<b>Public &amp; Open Space</b>	<b>915</b>	--	<b>0</b>	<b>0</b>	<b>3,981</b>	<b>1,447</b>
I - Institutions	183	0.5 (F)	0	0	3,981	1,183
MOS - Miscellaneous Open Space	68	--	0	0	0	100
NF - National Forest and National Forest Managed Lands	416	--	0	0	0	0
PR - Public and Private Recreation	103	--	0	0	0	164
U - Utilities	145	--	0	0	0	0
<b>Residential</b>	<b>3,516</b>	--	<b>15,335</b>	<b>58,558</b>	<b>0</b>	<b>495</b>
E - Estate/Equestrian	93	0.4 (D)	37	144	0	5
N - Non-Urban	327	1 (D)	105	403	0	0
LD - Low Density Residential	3,068	4.8 (D)	14,726	56,694	0	486
LMD - Low/Medium Density Residential	1	9.6 (D)	12	46	0	0
MD - Medium Density Residential	26	17.6 (D)	456	1,271	0	4
<b>PROPOSED ANTELOPE VALLEY AREA PLAN</b>						
	<b>1,130,584</b>	--	<b>67,463</b>	<b>256,626</b>	<b>1,223,533</b>	<b>46,225</b>
<b>Commercial</b>	<b>822</b>	--	<b>0</b>	<b>0</b>	<b>15,410</b>	<b>18,257</b>
CR - Rural Commercial	704	0.25 (F)	0	0	7,662	15,078
CM - Major Commercial	119	1.5 (F)	0	0	7,747	3,179

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
<b>Industrial</b>	<b>1,019</b>	--	<b>0</b>	<b>0</b>	<b>22,194</b>	<b>16,994</b>
IL - Light Industrial	953	0.5 (F)	0	0	20,758	15,894
IH - Heavy Industrial	66	0.5 (F)	0	0	1,436	1,100
<b>Mixed Use</b>	<b>321</b>	--	<b>1,283</b>	<b>4,940</b>	<b>3,493</b>	<b>6,924</b>
MU-R - Rural / Mixed Use	321	4 (D) / 0.25 (F)	1,283	4,940	3,493	6,924
<b>Open Space</b>	<b>584,097</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>396</b>
OS-BLM - Bureau of Land Management	9,258	--	0	0	0	0
OS-C - Open Space Conservation	3,656	--	0	0	0	50
OS-ML - Military Land	41,779	--	0	0	0	0
OS-NF - Open Space National Forest	498,809	--	0	0	0	0
OS-PR - Open Space Parks and Recreation	19,441	--	0	0	0	346
OS-W - Water	11,153	--	0	0	0	0
<b>Public / Semi-Public</b>	<b>18,097</b>	--	<b>0</b>	<b>0</b>	<b>1,182,435</b>	<b>2,771</b>
P - Public and Semi-Public Facility	18,097	1.5 (F)	0	0	1,182,435	2,771
<b>Rural</b>	<b>518,394</b>	--	<b>46,506</b>	<b>179,049</b>	<b>0</b>	<b>583</b>
RL40 - Rural Land 40	29,331	0.03 (D)	880	3,388	0	1
RL20 - Rural Land 20	316,361	0.05 (D)	15,818	60,899	0	150
RL10 - Rural Land 10	133,785	0.1 (D)	13,378	51,507	0	100
RL5 - Rural Land 5	18,626	0.2 (D)	3,725	14,342	0	0
RL2 - Rural Land 2	15,174	0.5 (D)	7,587	29,211	0	329
RL1 - Rural Land 1	5,117	1 (D)	5,117	19,701	0	2
<b>Residential</b>	<b>7,835</b>	--	<b>19,674</b>	<b>72,637</b>	<b>0</b>	<b>300</b>
H2 - Large Lot Residential	6,482	1.6 (D)	10,371	39,927	0	300
H5 - Suburban Residential	707	4 (D)	2,829	10,892	0	0
H9 - Suburban High Density Residential	494	7.2 (D)	3,559	12,814	0	0
H18 - Medium Density Residential	75	14.4 (D)	1,076	3,873	0	0
H30 - Urban Residential	77	24 (D)	1,839	5,131	0	0
<b>EAST LOS ANGELES COMMUNITY PLAN</b>	<b>3,381</b>	--	<b>41,608</b>	<b>128,487</b>	<b>44,199</b>	<b>43,283</b>
<b>Commercial</b>	<b>338</b>	--	<b>0</b>	<b>0</b>	<b>21,255</b>	<b>25,907</b>
CC - Community Commercial	150	1.5 (F)	0	0	9,778	19,139
CM - Commercial Manufacturing	93	1.3 (F)	0	0	5,252	4,189
MC - Major Commercial	95	1.5 (F)	0	0	6,225	2,578
<b>Industrial</b>	<b>158</b>	--	<b>0</b>	<b>0</b>	<b>6,873</b>	<b>5,234</b>
I - Industrial	158	1 (F)	0	0	6,873	5,234
<b>Mixed Use &amp; Specific Plan</b>	<b>65</b>	--	<b>1,563</b>	<b>4,361</b>	<b>3,404</b>	<b>6,650</b>
CR - Commercial Residential	65	24 (D) / 1.2 (F)	1,563	4,361	3,404	6,650
<b>Other</b>	<b>21</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
RP - Residential Parking	21	--	0	0	0	0
<b>Public &amp; Open Space</b>	<b>582</b>	--	<b>0</b>	<b>0</b>	<b>12,667</b>	<b>4,226</b>
P - Public Use	582	0.5 (F)	0	0	12,667	4,226
<b>Residential</b>	<b>2,218</b>	--	<b>40,045</b>	<b>124,127</b>	<b>0</b>	<b>1,266</b>
LD - Low Density Residential	132	6.4 (D)	843	3,246	0	0
LMD - Low/Medium Density Residential	1,045	13.6 (D)	14,207	51,146	0	420
MD - Medium Density Residential	1,041	24 (D)	24,994	69,735	0	846
<b>HACIENDA HEIGHTS COMMUNITY PLAN</b>	<b>6,360</b>	--	<b>17,349</b>	<b>65,511</b>	<b>10,117</b>	<b>14,004</b>
<b>Commercial</b>	<b>131</b>	--	<b>0</b>	<b>0</b>	<b>5,708</b>	<b>11,194</b>
CG - General Commercial	131	1 (F)	0	0	5,708	11,194
<b>Industrial</b>	<b>28</b>	--	<b>0</b>	<b>0</b>	<b>609</b>	<b>466</b>
IL - Light Industrial	28	0.5 (F)	0	0	609	466

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
<b>Public &amp; Open Space</b>	<b>1,709</b>	--	<b>0</b>	<b>0</b>	<b>3,800</b>	<b>325</b>
OS-C - Open Space Conservation	403	--	0	0	0	0
OS-PR - Open Space Parks and Recreation	1,131	--	0	0	0	225
P-CS - Public and Semi-Public Community Serving	42	0.5 (F)	0	0	904	100
P-TF - Public and Semi-Public Transportation Facilities	0	--	0	0	0	0
P-UF - Public and Semi-Public Utilities and Facilities	133	0.5 (F)	0	0	2,896	0
<b>Rural</b>	<b>862</b>	--	<b>145</b>	<b>559</b>	<b>0</b>	<b>13</b>
RL10 - Rural Lands 10	714	0.1 (D)	71	275	0	0
RL2 - Rural Lands 2	148	0.5 (D)	74	284	0	13
<b>Residential</b>	<b>3,630</b>	--	<b>17,204</b>	<b>64,952</b>	<b>0</b>	<b>2,006</b>
H2 - Residential 2	719	1.6 (D)	1,150	4,429	0	100
H5 - Residential 5	2,110	4 (D)	8,441	32,499	0	1,700
H9 - Residential 9	582	7.2 (D)	4,193	16,144	0	200
H18 - Residential 18	201	14.4 (D)	2,889	10,402	0	6
H30 - Residential 30	10	24 (D)	248	693	0	0
H50 - Residential 50	7	40 (D)	281	785	0	0
<b>MALIBU LOCAL COASTAL LAND USE PLAN</b>	<b>51,141</b>	--	<b>4,347</b>	<b>16,729</b>	<b>15,239</b>	<b>20,540</b>
<b>Commercial</b>	<b>729</b>	--	<b>0</b>	<b>0</b>	<b>6,352</b>	<b>11,929</b>
12 - Rural Business	18	0.2 (F)	0	0	158	309
13 - General Commercial	0.45	0.2 (F)	0	0	4	8
14 - Office/Commercial Services	0.18	0.2 (F)	0	0	2	5
16 - Low-Intensity Visitor-Serving Commercial Recreation	710	0.2 (F)	0	0	6,187	11,603
17 - Recreation-Serving Commercial	0.20	0.2 (F)	0	0	2	3
<b>Mixed Use &amp; Specific Plan</b>	<b>39</b>	--	<b>0</b>	<b>0</b>	<b>336</b>	<b>672</b>
MU - Mixed Use - Specific Plan Required	39	0.2 (F)	0	0	336	672
<b>Public &amp; Open Space</b>	<b>16,423</b>	--	<b>0</b>	<b>0</b>	<b>8,551</b>	<b>6,201</b>
11 - Institution and Public Facilities	982	0.2 (F)	0	0	8,551	6,034
18 - Parks	15,441	--	0	0	0	168
<b>Rural</b>	<b>32,945</b>	--	<b>3,298</b>	<b>12,697</b>	<b>0</b>	<b>1,738</b>
M2 - Mountain Land	23,051	0.05 (D)	1,153	4,437	0	1,589
5 - Rural Land III	2,615	0.5 (D)	1,196	4,604	0	120
4 - Rural Land II	3,375	0.2 (D)	603	2,320	0	15
3 - Rural Land I	3,905	0.1 (D)	347	1,336	0	14
<b>Residential</b>	<b>1,005</b>	--	<b>1,049</b>	<b>4,032</b>	<b>0</b>	<b>0</b>
6 - Residential I	903	1 (D)	674	2,595	0	0
8A - Residential III(A)	21	3.2 (D)	31	121	0	0
8B - Residential III(B)	75	4.8 (D)	331	1,273	0	0
9B - Residential IV(B)	5	8 (D)	7	29	0	0
9C - Residential IV(C)	0.47	16 (D)	5	15	0	0
<b>MARINA DEL REY LOCAL COASTAL LAND USE PLAN</b>	<b>699</b>	--	<b>7,551</b>	<b>21,067</b>	<b>1,866</b>	<b>3,598</b>
<b>Commercial</b>	<b>99</b>	--	<b>0</b>	<b>0</b>	<b>1,622</b>	<b>3,499</b>
H - Hotel	30	1027 rooms	0	0	0	7
MC - Marine Commercial	32	0.5 (F)	0	0	688	1,346
O - Office	5	1 (F)	0	0	236	780
VS/CC - Visitor-Serving / Convenience Commercial	32	0.5 (F)	0	0	698	1,366

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
<b>Industrial</b>	<b>8</b>	--	<b>0</b>	<b>0</b>	<b>164</b>	<b>0</b>
PF - Public Facilities	8	0.5 (F)	0	0	164	0
<b>Other</b>	<b>403</b>	--	<b>0</b>	<b>0</b>	<b>80</b>	<b>86</b>
B - Boat Storage	18	0.1 (F)	0	0	80	80
P - Parking	20	--	0	0	0	5
W - Water	365	--	0	0	0	0
<b>Public &amp; Open Space</b>	<b>35</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>
OS - Open Space	35	--	0	0	0	13
<b>Residential</b>	<b>154</b>	--	<b>7,551</b>	<b>21,067</b>	<b>0</b>	<b>0</b>
R III - Residential III	38	28 (D)	1,065	2,970	0	0
R IV - Residential IV	21	36 (D)	739	2,060	0	0
R V - Residential V	96	60 (D)	5,748	16,037	0	0
<b>ROWLAND HEIGHTS COMMUNITY PLAN</b>	<b>7,422</b>	--	<b>14,115</b>	<b>50,900</b>	<b>12,134</b>	<b>20,661</b>
<b>Commercial</b>	<b>192</b>	--	<b>0</b>	<b>0</b>	<b>8,378</b>	<b>15,764</b>
C - Commercial	192	1 (F)	0	0	8,378	15,764
<b>Industrial</b>	<b>144</b>	--	<b>0</b>	<b>0</b>	<b>3,756</b>	<b>3,027</b>
I - Industrial	144	0.6 (F)	0	0	3,756	3,027
<b>Other</b>	<b>793</b>	--	<b>723</b>	<b>2,783</b>	<b>0</b>	<b>0</b>
TOS - Transitional Open Space (N1)	272	0.2 (D)	54	210	0	0
TOS - Transitional Open Space (N2)	268	1 (D)	181	695	0	0
TOS - Transitional Open Space (U1)	252	2.56 (D)	488	1,878	0	0
<b>Public &amp; Open Space</b>	<b>1,566</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>194</b>
O - Open Space	1,566	--	0	0	0	194
<b>Residential</b>	<b>4,727</b>	--	<b>13,392</b>	<b>48,117</b>	<b>0</b>	<b>1,676</b>
N1 - Non-Urban 1	1,459	0.2 (D)	292	1,124	0	0
N2 - Non-Urban 2	510	1 (D)	449	1,730	0	200
U1 - Urban 1	1,276	2.56 (D)	2,857	10,998	0	401
U2 - Urban 2	1,278	4.8 (D)	5,903	22,728	0	1,075
U3 - Urban 3	68	9.6 (D)	643	2,477	0	0
U4 - Urban 4	51	17.6 (D)	902	2,517	0	0
U5 - Urban 5	84	28 (D)	2,345	6,543	0	0
<b>SANTA CATALINA ISLAND LOCAL COASTAL LAND USE PLAN</b>	<b>46,137</b>	--	<b>21</b>	<b>0</b>	<b>0</b>	<b>570</b>
<b>Commercial</b>	<b>26</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>
Commercial - Two Harbors	3	--	0	0	0	7
Lodges/Inns - Two Harbors	14	--	0	0	0	0
Marine Commercial - Two Harbors	3	--	0	0	0	0
Utilites/Services - Two Harbors	7	--	0	0	0	0
<b>Industrial</b>	<b>690</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>6</b>
Extractive Use - Catalina	514	--	0	0	0	0
Industrial/Transportation - Two Harbors	5	--	0	0	0	0
Industrial/Transportation/Utilities - Catalina	172	--	0	0	0	6
<b>Other</b>	<b>87</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
undefined* - Two Harbors	3	--	0	0	0	0
View Corridor - Two Harbors	84	--	0	0	0	0
<b>Public &amp; Open Space</b>	<b>45,197</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>557</b>
Conservation/Primitive Recreation - Catalina	20,212	--	0	0	0	32
Conservation/Recreation - Two Harbors	820	--	0	0	0	17
Open Space/Recreation - Two Harbors	108	--	0	0	0	2
Open Space/Structured Recreation - Catalina	24,057	--	0	0	0	505

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
<b>Residential</b>	<b>136</b>	--	<b>21</b>	<b>0</b>	<b>0</b>	<b>0</b>
Residential Land Uses - Two Harbors	136	0.25 (D)	21	0	0	0
<b>SANTA CLARITA VALLEY AREA PLAN<sup>6</sup></b>	<b>270,887</b>	--	<b>84,000</b>	<b>237,387</b>		<b>107,123</b>
<b>Residential</b>	--	--	<b>84,000</b>	<b>237,387</b>	--	--
<b>Non-Residential</b>	--	--	--	--	--	<b>81,265-107,123</b>
<b>SANTA MONICA MOUNTAINS NORTH AREA PLAN</b>	<b>20,645</b>	--	<b>2,538</b>	<b>9,771.25</b>	<b>14,549</b>	<b>6,806</b>
<b>Commercial</b>	<b>172</b>	--	<b>0</b>	<b>0</b>	<b>3,336</b>	<b>6,196</b>
C - Commercial	125	0.5 (F)	0	0	2,725	5,001
CR - Commercial Recreation - Limited Intensity	47	0.3 (F)	0	0	611	1,195
<b>Infrastructure</b>	<b>0</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
TC - Transportation Corridor	0	--	0	0	0	0
<b>Public &amp; Open Space</b>	<b>7,051</b>	--	<b>0</b>	<b>0</b>	<b>11,214</b>	<b>73</b>
OS - Open Space	775	--	0	0	0	0
OS-DR - Open Space Deed Restricted	657	--	0	0	0	0
OS-P - Open Space Parks	5,065	--	0	0	0	62
OS-W - Open Space Water	39	--	0	0	0	11
P - Public and Semi-Public Facilities	515	0.5 (F)	0	0	11,214	0
<b>Rural</b>	<b>12,920</b>	--	<b>1,601</b>	<b>6,164</b>	<b>0</b>	<b>537</b>
N20 - Mountain Lands 20	5,505	0.05 (D)	275	1,060	0	16
N10 - Mountain Lands 10	4,265	0.1 (D)	369	1,419	0	200
N5 - Mountain Lands 5	2,028	0.2 (D)	361	1,388	0	200
N2 - Rural Residential 2	668	0.5 (D)	292	1,124	0	100
N1 - Rural Residential 1	454	1 (D)	305	1,173	0	21
<b>Residential</b>	<b>503</b>	--	<b>937</b>	<b>3,608</b>	<b>0</b>	<b>0</b>
U2 - Residential 2	329	1.6 (D)	457	1,758	0	0
U4 - Residential 4	148	3.2 (D)	344	1,323	0	0
U8 - Residential 8	26	6.4 (D)	137	526	0	0
<b>TWIN LAKES COMMUNITY PLAN</b>	<b>45</b>	--	<b>45</b>	<b>174</b>	<b>0</b>	<b>0</b>
<b>Rural</b>	<b>45</b>	--	<b>45</b>	<b>174</b>	<b>0</b>	<b>0</b>
RC - Rural Communities	45	1 (D)	45	174	0	0
<b>WALNUT PARK NEIGHBORHOOD PLAN</b>	<b>369</b>	--	<b>4,338</b>	<b>13,717</b>	<b>2,558</b>	<b>5,044</b>
<b>Commercial</b>	<b>41</b>	--	<b>0</b>	<b>0</b>	<b>2,135</b>	<b>4,358</b>
GC - General Commercial	35	1.3 (F)	0	0	1,963	3,786
OC - Office Commercial	7	0.6 (F)	0	0	173	572
<b>Industrial</b>	<b>8</b>	--	<b>0</b>	<b>0</b>	<b>180</b>	<b>112</b>
PU/I - Public Use / Institutional	8	0.5 (F)	0	0	180	112
<b>Mixed Use &amp; Specific Plan</b>	<b>11</b>	--	<b>0</b>	<b>0</b>	<b>242</b>	<b>474</b>
MC - Mixed Commercial	11	0.5 (F)	0	0	242	474
<b>Other</b>	<b>4</b>	--	<b>26</b>	<b>100</b>	<b>0</b>	<b>0</b>
R/P - Residential / Parking	4	7.2 (D)	26	100	0	0
<b>Residential</b>	<b>305</b>	--	<b>4,312</b>	<b>13,617</b>	<b>0</b>	<b>100</b>
NP I - Neighborhood Preservation I	167	7.2 (D)	1,200	4,619	0	100
NP II - Neighborhood Preservation II	21	14.4 (D)	298	1,146	0	0
NR - Neighborhood Revitalization	117	24 (D)	2,814	7,852	0	0
<b>WEST ATHENS - WESTMONT NEIGHBORHOOD PLAN</b>	<b>1,489</b>	--	<b>11,185</b>	<b>40,539</b>	<b>10,820</b>	<b>10,894</b>
<b>Commercial</b>	<b>155</b>	--	<b>0</b>	<b>0</b>	<b>6,047</b>	<b>8,456</b>
C.1 - Regional Commercial	45	1 (F)	0	0	1,940	1,060
C.2 - Community Commercial	81	1 (F)	0	0	3,513	6,994
C.3 - Neighborhood Commercial	2	0.5 (F)	0	0	41	79
C.4 - Commercial Manufacturing	15	0.64 (F)	0	0	416	318

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
CR - Commercial Recreation	13	0.25 (F)	0	0	137	5
<b>Public &amp; Open Space</b>	<b>278</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>4,773</b>	<b>1,813</b>
OS.1 - Recreation / Open Space	122	--	0	0	0	70
PL.1 - Public/Quasi-Public Use	157	0.7 (F)	0	0	4,773	1,743
<b>Residential</b>	<b>1,057</b>	<b>--</b>	<b>11,185</b>	<b>40,539</b>	<b>0</b>	<b>625</b>
RD 2.3 - Single Family Residence	485	6.4 (D)	3,103	11,945	0	325
RD 3.1 - Two Family Residence	549	13.6 (D)	7,463	26,868	0	200
RD 3.2 - Medium Density Bonus	19	24 (D)	463	1,292	0	100
SCD - Senior Citizen Density Bonus	4	40 (D)	156	434	0	0
<b>Grand Total</b>	<b>1,651,394</b>	<b>--</b>	<b>476,105</b>	<b>1,600,381</b>	<b>1,928,535</b>	<b>480,121</b>

Notes:

1. Historically, jurisdiction-wide buildout levels do not achieve the maximum allowable density/intensity on every parcel and are, on average, lower than allowed by the General Plan. Accordingly, the buildout projections in this General Plan do not assume buildout at the maximum density or intensity and instead are adjusted downward to account for variations in buildout intensity.
2. The County has adopted a total of 13 community-based plans. The adoption date of these community-based plans vary and the boundaries of the community plans may or may not be coterminous with a specific plan.
3. Acres are given as adjusted gross acreages, which do not include the right-of-way for roadways, flood control facilities, or railroads.
4. The density/intensity figure shown reflects the projected density/intensity for buildout purposes, which is generally 80% of the maximum density/intensity permitted for that land use category. (D) denotes residential density and (F) denotes Floor Area Ratio.
5. Projections of population by residential designation are based on a persons-per-household factor that varies by housing type. Additionally, the projections of jobs by designation are based on an employment generation factor that varies by employment category, or actual number of jobs.
6. The figures for the unincorporated Santa Clarita Valley reference the figures in the 2010 Revised Draft Environmental Impact Report for the Santa Clarita Valley Area Plan Update (One Valley One Vision). The methodology used to derive the figures for the unincorporated Santa Clarita Valley differs from the methodology used to generate the figures for other unincorporated areas and, therefore, they cannot be broken down by Land Use Category.

The project will replace the adopted General Plan, including all of the elements (excluding the Housing Element, adopted in 2008), land use distribution maps, and circulation maps. Other components of the comprehensive General Plan Update include, but are not limited to:

- Update the Special Management Areas including but not limited to Agricultural Resource Areas, Seismic Hazard Zones, Flood Hazard Zones, Significant Ecological Areas, Hillside Management Areas, and Very High Fire Hazard Severity Zones.
- Update Significant Ecological Areas boundaries.
- Update of the Highway Plan.
- Amendments to the existing County ordinances and/or adoption of new County ordinances as necessary to implement the updated General Plan, including but not limited to the SEA CUP Ordinance, Hillside Management Ordinance, and the addition of new zones to implement portions of the land use legend.
- Rezoning as necessary to implement and/or maintain consistency with the updated General Plan.
- Rescinding or updating outdated policies, ordinances, manuals, codes and other guidance documents and enacting new implementing policies, ordinances, manuals, and other guidance documents as needed to reflect current law and the updated General Plan
- Digitizing and parcelizing land use policy maps for existing Community, Neighborhood and Local Coastal Programs.
- The project will also replace the existing Antelope Valley Area Plan including all elements and the land use policy map.

## 2.2 Draft Antelope Valley Area Plan

The proposed project will also replace the existing Antelope Valley Area Plan (Area Plan). As a component of the Los Angeles County General Plan, the Area Plan refines the countywide goals and policies in the General Plan by addressing specific issues relevant to the Antelope Valley, such as community maintenance and appearance, preservation of rural character, open space, and agricultural lands, and provides more specific guidance on elements already found in the General Plan. All issues not covered in the Area Plan are addressed by the General Plan. The Draft Area Plan replaces all elements and the land use policy map. The Area Plan is organized into six chapters.

- Chapter 1 (Introduction) presents the Area Plan's purpose and values, the geographic area, and the communities' vision statement.
- Chapter 2 (Land Use Element) discusses how the communities' vision translates into a development pattern through the concept of land use.
- Chapter 3 (Mobility Element) describes the multimodal approach to moving around the Antelope Valley.
- Chapter 4 (Conservation and Open Space Element) describes conservation efforts to address potential threats to natural resources.
- Chapter 5 (Public Safety, Services, & Facilities Element) provides measures to ensure services are in place to maintain the safety and welfare of residents. Chapters 2 through 5 contain goals and policies specific to each chapter's respective topic but all work jointly to comprehensively implement the overall vision.
- Chapter 6 (Community-Specific Land Use Concepts) highlights each established town and describes its land use form in more detail.

The Area Plan is the result of a highly inclusive and extensive community participation program launched in the fall of 2007. Through a series of 24 community meetings, residents and other stakeholders worked alongside planners to develop a shared vision of the future, identify community issues, draft proposals for the future, and prioritize their recommendations. This vision of the Antelope Valley's future serves as a touchstone through the planning process, and it is reflected in the land use map, goals, and policies that comprise the Area Plan. Collectively, these environments preserve the rural character of the region, conserve environmental resources, and protect residents from potential hazards while allowing for additional growth and development. The following describes the major land use policies in the draft Area Plan.

**Rural Preservation Strategy:** The proposed Area Plan includes a Rural Preservation Strategy addressing issues of Valley-wide significance in a manner that builds upon the communities' vision statement and is based on three types of environments—rural town center areas, rural town areas, and rural preserve areas—that serve different purposes.

- **Rural town center areas** are the focal points of rural communities, accessible by a range of transportation options to reduce vehicle trips, serving the daily needs of residents, and providing local employment opportunities. These areas will be designated for commercial and/or industrial use as they are in the current Area Plan, but some of these areas will also allow a mix of commercial and residential uses.
- **Rural town areas** provide a transition between rural town center areas and rural preserve areas. They are occupied by a mix of residential and light agricultural uses. The majority of new residential development should be directed to these areas, provided that such development is consistent with the existing community character and allows for light agricultural, equestrian, and animal-keeping uses where appropriate. Accordingly, allowable residential densities in these areas will generally be equal to, or greater than, allowable residential densities in the current Area Plan. These areas will provide

transportation linkages to rural town center areas and other nearby destination points, but residents of these areas must be willing to forego urban infrastructure and services in order to live in a rural environment.

- **Rural preserve areas** are the remaining portions of the unincorporated Antelope Valley, which are largely undeveloped and are generally not served by existing infrastructure and public facilities. Many of these areas contain Special Management Areas, such as Significant Ecological Areas, Agricultural Resource Areas, and Seismic Hazard Zones. Therefore, residential development in these areas should be limited to single-family homes at very low densities. Accordingly, allowable residential densities in these areas will generally be far less than allowable residential densities in the current Area Plan. These areas are less likely to benefit from increased property tax revenues and developer fees, which may make it difficult to fund additional infrastructure, such as major roadways, water lines, and sewer lines. The Rural Preservation Strategy acknowledges this by directing additional infrastructure to rural town center areas and rural town areas, where the placement of additional infrastructure will be more cost-effective and will generally have fewer effects on the environment. Residents of these areas must be willing to forego additional infrastructure in order to live in a very remote rural environment and to enjoy the benefits offered by such an environment.

For more information on the Rural Preservation Strategy and its three types of environments please see Preliminary Draft Antelope Valley Area Plan Chapter 1: *Introduction* and Chapter 2: *Land Use Element*.

### 3. PROBABLE ENVIRONMENTAL EFFECTS

#### Environmental Issues:

The County has determined that a Program EIR will be prepared for the proposed comprehensive General Plan Update. Section 15168 of the CEQA Guidelines states that a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. The Program EIR will be prepared in accordance with the requirements of CEQA Statutes and Guidelines, as amended. Pursuant to Section 15146 of the CEQA Guidelines the degree of specificity in the Program EIR will correspond to the degree of specificity involved in the comprehensive General Plan Update. The EIR will focus on the primary effects that can be expected to follow from adoption of the comprehensive General Plan Update and Antelope Valley Plan Update and will not be as detailed as an EIR on the specific development or construction projects that may follow. Based on the County's preliminary analysis of the project, the following environmental issues will be examined in the Program EIR:

- |  |   |  |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics               | <input checked="" type="checkbox"/> Agricultural and Forest Resources | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources     | <input checked="" type="checkbox"/> Cultural Resources                | <input checked="" type="checkbox"/> Geology / Soils                    |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials     | <input checked="" type="checkbox"/> Hydrology / Water Quality          |
| <input checked="" type="checkbox"/> Land Use / Planning      | <input checked="" type="checkbox"/> Mineral Resources                 | <input checked="" type="checkbox"/> Noise                              |
| <input checked="" type="checkbox"/> Population / Housing     | <input checked="" type="checkbox"/> Public Services                   | <input checked="" type="checkbox"/> Recreation                         |
| <input checked="" type="checkbox"/> Transportation / Traffic | <input checked="" type="checkbox"/> Utilities / Service Systems       | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

The Draft EIR will address the short- and long-term effects of the Los Angeles County General Plan Update and Antelope Valley Area Plan Update on the environment. Mitigation measures will be proposed for those impacts that are determined to be significant. A mitigation monitoring program will also be developed as required by Section 15150 of the CEQA Guidelines.

## Urban Development: Potential Water Quality Impacts and Required Analyses

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### INTRODUCTION

This Attachment consists of a table and a diagram showing how urban development can affect water quality, and the information needed to predict and manage the impacts. Pollution pathways are described and diagrammed at the level of detail at which potential effects can be analyzed and management measures applied. The table and diagram are described (and in electronic version hyperlinked) below.

Watersheds are complex natural systems in which physical, chemical, and biologic components interact to create and maintain the beneficial uses of water on which society's well-being and economy depend. Similarly, disturbances to natural watershed dynamics caused by urban development degrade water quality through a complex of interrelated causes and effects. Unmanaged, these pollution pathways ultimately destroy the physical, chemical, and biological integrity of the watersheds in which they occur, diminishing or destroying the beneficial uses.

The table and diagram are:

**Table 1**, Potential Effects Of Urban Development On Beneficial Uses and Required Analyses outlines the causes of water quality degradation caused by urban development, provides literature citations for each of the effects, and identifies for each effect the project-specific information needed to assess and mitigate its adverse impact to water quality.

**Figure 1**, Potential Effects Of Urban Development On Beneficial Uses flowcharts the causes and effects listed in Table 1. It begins on the left with three activities which are associated with urbanization: filling, construction (active construction and post-construction phases), and channelization. Figure 1 ends on the right with the resulting impaired beneficial uses and the potential for increased maintenance and property damage. In between are intermediate processes. Cause-and-effect relationships are shown by arrows.

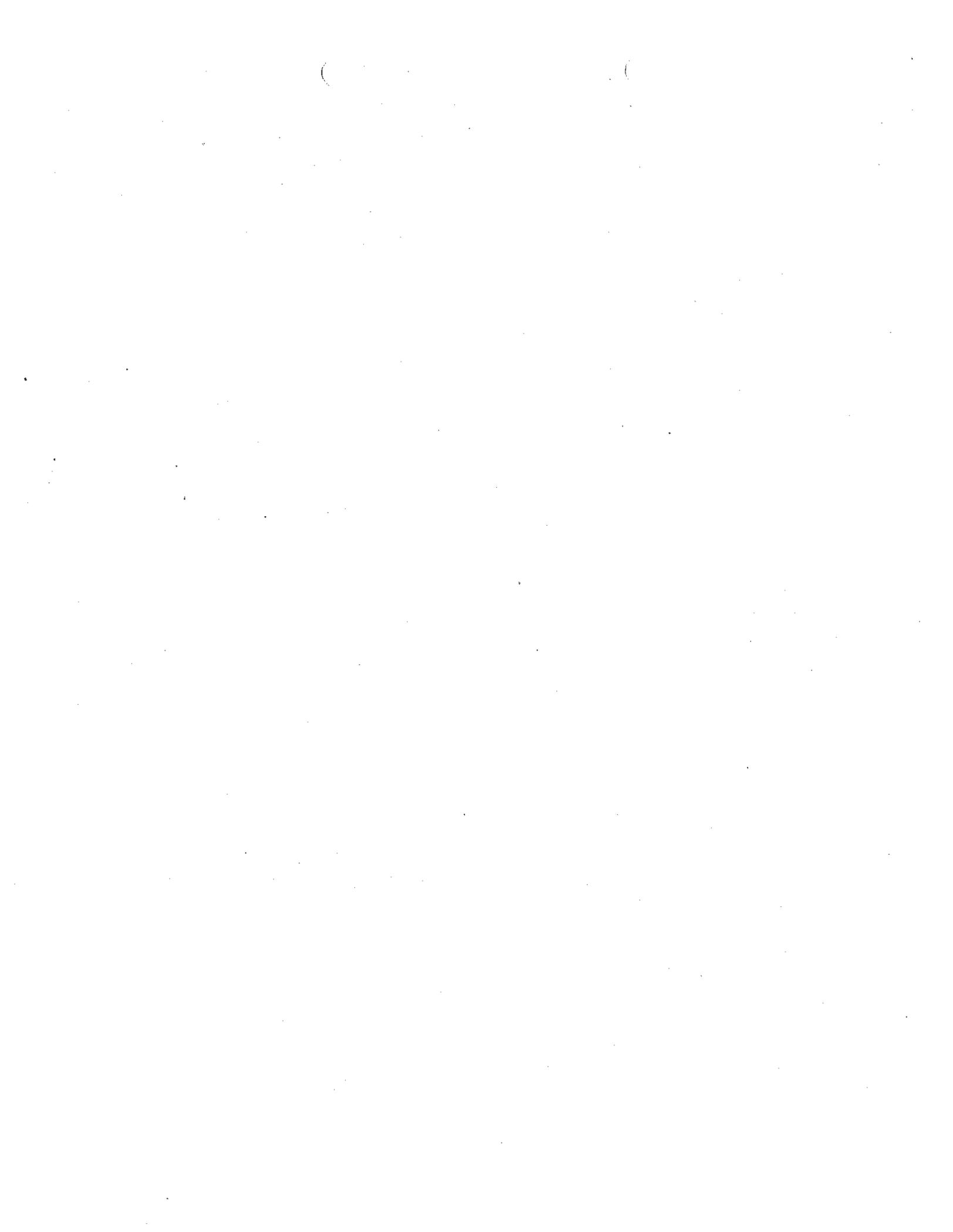


TABLE 1

**Potential Effects of Urban Development on Beneficial Uses  
 and Required Analyses**

**Urban development degrades water quality through a complex of interrelated causes and effects.**

**How to Use this Table.** Table 1 outlines the pollution pathways potentially associated with urban development, provides literature citations for each cause-and-effect relationship, and identifies the information needed to assess and manage potential effects on a project-specific basis. The pollution pathways are described at the level of detail at which project-specific potential effects can be analyzed and management measures applied. The same analysis can also be applied more broadly at a general level, e.g., to urban development that would be authorized under a land-use general plan. This Table is comprised of three worksheet sub-tables described below. (In the electronic version of this table, the sub-tables are accessed via tabs at the bottom of the page).

The "**Potential Water Quality Impacts and Required Analyses**" worksheet displays the potential causes and effects (in the "Cause" and "Effect" columns respectively) of water quality degradation associated with urban development, and the information needed to assess and manage project-specific effects (the "Needed Analysis" column). Because of the complex nature of watershed dynamics, many "effects" are also "causes" along the pollution pathways, and the number in square brackets listed with each "effect" cross-reference to its enumerated place in the "Cause" column. Additionally, each of the "effects" is footnoted, and the footnote number refers to the associated note in the "Notes" sub-table.

A **Related Flow-Chart Diagram** (Figure 1, "Potential Effects of Urban Development on Beneficial Uses") graphically displays these cause-and-effect relationships.

The "**Notes**" worksheet displays the summary literature citations for each of the "effects" in the "Potential Water Quality Impacts..." sub-table, keyed to the numeric footnotes in the "Effects" column.

The "**References**" worksheet displays the full literature citations, indexed by author.

CAUSE	EFFECT	NEEDED ANALYSES
<b>1. FILL &amp; EXCAVATION</b> Fill or excavation in wetlands, riparian areas, or other waters of the state.	<b>A. Decreased Flood Storage. [4]</b> Fill can impinge on the natural storage volume of ephemeral, intermittent, and perennial channels, backwaters, and wetlands, reducing capacity to retain runoff. <sup>1</sup>	1) Quantify reduced flood storage in each affected basin. 2) Identify mitigation.
	<b>B. Change in Groundwater Storage. [10]</b> Fill and excavation can decrease groundwater recharge and cause lower water tables by changing soil percolation characteristics and reducing the area of standing water in recharge basins. <sup>2</sup> Linear excavation (e.g., for utility lines) can act as a conduit to drain groundwater and locally lower water tables.	1) Quantify groundwater response to changes in percolation. 2) Identify locations where linear alignments could act to dewater shallow aquifers. 3) Identify mitigation.

CAUSE	EFFECT	NEEDED ANALYSES
<b>2A. CONSTRUCTION</b> Clearing, grading, and construction of structures and facilities.	<b>C. Change in Wetland and Riparian Vegetation. [17]</b> Fill and excavation can bury or remove vegetation and can change site features to prevent reestablishment of characteristic species.	1) Identify and map types and areal extents of affected vegetation. 2) Identify mitigation.
	<b>D. Impaired Beneficial Uses. [18]</b> Fill can directly impair beneficial uses by reducing water area and changing hydrology, geomorphology, substrate, and other waterbody characteristics. In addition, projects which fragment habitat and reduce wildlife movement along riparian and other corridors can degrade remaining patches of wetlands and other habitat by changing their physical characteristics and by isolating and exposing small populations of plants and animals, resulting in local or regional extinctions. <sup>3</sup>	1) Document types, areal extents, and (for drainage features) lengths of affected waters. 2) Characterize and map at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity. 3) Identify effects of fill on terrestrial and aquatic habitat connectivity (refer to Enclosure 3). 4) Identify watershed-level effects on pollutant removal and flood retention. 5) Identify mitigation.
	<b>A. Production of Urban Pollutants. [7]</b> Construction can produce pollutants through improper use and disposal of toxic construction materials.	1) Identify mitigation for inclusion in stormwater pollution prevention plan.
<b>B. Change in Soil Erosion. [8]</b> Active construction can dramatically increase soil erosion by exposing and destabilizing soils. Erosion is compounded by the increased runoff typically accompanying construction. <sup>6</sup>	1) Identify location and extent of planned grading. Display proximity and slope relationships to receiving drainages. 2) Document erodibility of soils and subsoils in areas proposed for grading. 3) Quantify amount and duration of increased sediment loadings to each affected drainage. 4) Identify mitigation.	
<b>C. Increased Runoff. [9]</b> Construction can increase both the total and peak volume of stormwater runoff by removing vegetation, compacting soil, exposing dense subsoil, creating steep graded slopes, and eliminating terrain depressions and ephemeral and intermittent drainages that would naturally slow the movement of stormwater. <sup>9</sup>	1) Quantify total and peak volumes of increased runoff for each affected drainage 2) Identify mitigation.	

CAUSE	EFFECT	NEEDED ANALYSES
<b>2B. POST-CONSTRUCTION</b> Ongoing effects of constructed environment.	<b>D. Impaired Beneficial Uses. [18]</b> Projects which fragment habitat and reduce wildlife movement along riparian and other corridors can degrade remaining patches of wetlands and other habitat by changing their physical characteristics and by isolating and exposing small populations of plants and animals, resulting in local or regional extinctions. <sup>11</sup>	1) Characterize and map at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity. 2) Identify effects of construction on terrestrial and aquatic habitat connectivity (refer to Enclosure 3). 3) Identify mitigation.
	<b>A. Dry weather discharge. [6]</b> Construction can cause dry-season "nuisance" runoff from activities such as landscape irrigation <sup>5</sup> , sidewalk and vehicle washing, and basement dewatering.	1) Characterize volumes, seasonality, and other pertinent characteristics of "nuisance" flows for each affected drainage.
	<b>B. Increased Groundwater Pumping. [5]</b> Construction can cause increased groundwater pumping for domestic or landscape use. <sup>4</sup>	1) Quantify and map locations of increased pumping.
	<b>C. Production of Urban Pollutants. [7]</b> After construction, urban areas can generate pesticides, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, bacteria, viruses, and other pollutants from activities such as landscape care and vehicle operation and maintenance. <sup>7</sup>	1) Quantify projected increase in pollution production in each affected basin. 2) Identify mitigation.
	<b>D. Change in Soil Erosion. [8]</b> After construction, erosion can be reduced to below natural levels because soils are covered with buildings and pavement, and runoff is routed through storm drains. <sup>8</sup>	1) Quantify reduction of natural sediment delivery rates to each affected basin. 2) Identify mitigation.
<b>E. Increased Runoff. [9]</b> After construction, maintained landscapes and impervious surfaces such as roofs and streets increase total and peak runoff. The increased flows move quickly over paved surfaces and are collected, concentrated, and further accelerated in stormdrain systems. The combination of increased flows and more efficient transport causes a higher, "flashy", more rapidly peaking and falling hydrograph, especially for smaller, more frequent floods. <sup>10</sup>	1) Quantify project-induced changes in total and peak runoff rates to each affected drainage. 2) Identify mitigation.	

CAUSE	EFFECT	NEEDED ANALYSES
<p><b>3. CHANNELIZATION</b>                      Engineered changes in channel structure or morphology to stabilize banks, prevent flooding, or increase flow conveyance.</p>	<p><b>A. Decreased Flood Storage. [4]</b>                      Channelization can reduce flood storage within a basin by restricting flows to the active channel, thereby preventing detention of floodwater in backwaters and on the adjacent floodplain.<sup>12</sup></p>	<p>1) Quantify and map reductions in flood storage in each affected basin.                      2) Identify mitigation.</p>
	<p><b>B. Change in Groundwater Storage. [10]</b>                      Lining channel bottoms can change groundwater storage by reducing percolation and groundwater recharge.<sup>13</sup> Deepening natural channels can drain adjacent shallow water tables.<sup>14</sup></p>	<p>1) Quantify and map locations of reduction in recharge rates.                      2) Quantify effects on channelization on shallow water tables and associated wetlands.                      3) Identify mitigation.</p>
	<p><b>C. Channel Destabilization. [11]</b>                      Channelization can cause channel destabilization by changing the balance between the stream's flow, sediment load, and channel form. Destabilization tends to affect entire stream systems. For example, channelization can concentrate and synchronize peak flows from tributary streams, causing increased channel erosion both above and below the channelized reach. The eroded sediment is then deposited downstream when the flow slows down, where it may initiate further destabilization.<sup>15</sup></p>	<p>1) Quantify basin-level hydrologic and fluvial geomorphic effects of channelization in each affected drainage.                      2) Identify mitigation.</p>
	<p><b>D. Increased Flooding Frequency. [14]</b>                      Constricted channels (e.g., in leveed sections) can cause water to back up, resulting in localized upstream flooding. Rapid passage of floodwaters through "improved" channels can increase flooding downstream by concentrating and synchronizing tributary peaks.<sup>16</sup></p>	<p>1) Quantify basin-level hydrologic effect of channelization on each affected basin, including changes in flood return frequencies.                      2) Identify mitigation.</p>
	<p><b>E. Decreased Pollutant Removal. [16]</b>                      Channelization can decrease natural pollutant removal by reducing instream structural complexity and turbulent-flow aeration, increasing flow velocity, reducing overbank flow, and by causing change in vegetation.<sup>17</sup></p>	<p>1) Map waters lost to channelization in each affected drainage and characterize type, areal extent, and pollutant removal value.                      2) Quantify affect on pollutant loadings to each affected waterbody and downstream receiving waters.                      3) Identify mitigation.</p>

CAUSE	EFFECT	NEEDED ANALYSES
	<p><b>F. Change in Wetland and Riparian Vegetation. [17]</b>                      Channelization and associated maintenance can directly destroy wetland and riparian vegetation and can change site features to prevent reestablishment of characteristic species.<sup>18</sup></p>	<p>1) Map and Identify types and areas of affected vegetation.                      2) Identify mitigation.</p>
	<p><b>G. Impaired Beneficial Uses. [18]</b>                      Channelization and associated maintenance can directly impair beneficial uses by reducing waterbody area; increasing stream velocity; disrupting riffle and pool sequences, cover, and other structural features; changing substrate; cutting off nutrient inputs to and from backwaters and riparian wetlands, dewatering upstream reaches, and reducing aesthetic and recreational value. Reduced overbank flooding can adversely affect reproduction of riparian vegetation and wetland and riparian functions.<sup>19</sup>                      Channelization can inhibit the movement of fish, other aquatic biota, and wildlife, and thus isolate and reduce the viability of populations up and downstream.<sup>20</sup> Construction of channels can introduce sediment, nutrients, and toxics into the water column.<sup>21</sup></p>	<p>1) Identify direct and indirect effects of proposed channelization projects on beneficial uses.                      2) Characterize and display at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity.                      3) Identify effects of channelization on terrestrial and aquatic habitat connectivity.                      4) Identify mitigation.</p>
<p><b>4. DECREASED FLOOD STORAGE</b></p>	<p><b>A. Increased Runoff. [9]</b>                      Reduced flood storage on the floodplain and in channels, swales, wetlands, backwaters, and other natural depressions increases and accelerates runoff.<sup>22</sup></p>	<p>1) Quantify total and peak volumes of increase runoff for each affected drainage.                      2) Identify mitigation.</p>
<p><b>5. INCREASED GROUNDWATER PUMPING</b></p>	<p><b>A. Change in Groundwater Storage. [10]</b>                      Increased groundwater pumping can lower watertables locally or in distant donor basins.<sup>23</sup></p>	<p>1) Quantify and map locations of project-induced changes in groundwater levels.                      2) Identify mitigation.</p>
<p><b>6. DRY WEATHER DISCHARGE</b></p>	<p><b>A. Change in Baseflow. [12]</b>                      Dry weather runoff from urban activities can increase dry-period streamflows.<sup>24</sup></p>	<p>1) Quantify hydrologic effects of dry weather flows on the baseflow of each affected drainage.</p>

CAUSE	EFFECT	NEEDED ANALYSES
7. PRODUCTION OF URBAN POLLUTANTS	<p><b>B. Increased Pollutant Delivery. [13]</b>                      Dry weather runoff can carry the pollutants generated by the activity causing the flow, e.g., pesticides, nutrients, and petrochemicals from landscape maintenance and cleaning sidewalks and vehicles. Collection of polluted dry weather flows in catch basins may result in shock loadings when it is displaced by subsequent storm flows.<sup>25</sup></p>	<p>1) Quantify and characterize pollutant loadings from activities generating dry weather runoff to each affected drainage.                      2) Identify mitigation.</p>
	<p><b>A. Increased Pollutant Delivery. [13]</b>                      Increased production of urban pollutants can cause increased delivery of pollutants to surface and groundwater.<sup>26</sup></p>	<p>1) Quantify and characterize pollutant loadings from to each affected drainage.                      2) Identify mitigation.</p>
8. CHANGE IN SOIL EROSION	<p><b>A. Channel Destabilization. [11]</b>                      Changes in upland soil erosion can destabilize stream channels by changing the amount of sediment carried into the stream. The stream may then erode or aggrade its channel to balance its available energy with the changes in its sediment load.</p> <p>1. Increased sediment from construction causes channel aggradation, changing stream cross sections and redirecting flows.<sup>27</sup></p> <p>2. Decreased sediment from a paved watershed can cause channel incision and/or side-cutting. The effect may be compounded by increased runoff from the paved watershed. Aggradation may occur downstream where the flow slows and deposits the eroded sediment, which may deflect flows against the channel banks and cause further bank erosion.<sup>28</sup></p>	<p>1) Conduct geomorphologic analysis of channel response to increases in construction-related sediment.                      2) Conduct geomorphologic analysis of channel response to long-term reductions in sediment delivery to each affected drainage.                      3) Identify mitigation.  <u>Note:</u> Sediment as a pollutant is considered in No. 7, "Production of Urban Pollutants".</p>
9. INCREASED RUNOFF	<p><b>A. Change in Soil Erosion. [8]</b>                      Increased runoff can dramatically increase soil erosion by causing greater runoff velocities which more effectively displace and carry soil particles. Construction-related soil destabilization can compound the effect.<sup>29</sup></p> <p><b>B. Change in Groundwater Storage. [4]</b>                      Increased runoff can reduce groundwater recharge and lower water tables, since water draining from impervious surface is unable to percolate to groundwater at that location.<sup>30</sup></p>	<p>1) Quantify increases in sheet and gully erosion resulting from increased runoff.                      2) Identify mitigation.</p> <p>1) Map locations of and quantify losses of recharge and water table response.                      2) Identify mitigation.</p>

CAUSE	EFFECT	NEEDED ANALYSES
	<p><b>C. Channel Destabilization. [11]</b>                      Increased peak runoff can destabilize channels by increasing the flow velocity and erosive power of the stream. Head cutting, incision and/or widening of the channel, and associated sideslope failures can result. Reduced sediment input as a result of change in soil erosion rates can compound the effect.<sup>31</sup> In small streams, increased runoff may also dislodge logs and other channel features that help to define the channel.<sup>32</sup></p>	<p>1) Quantify channel geomorphic response to increased runoff for each affected drainage.                      2) Identify mitigation.</p>
	<p><b>D. Increased Pollutant Delivery. [13]</b>                      Increased runoff increases pollutant delivery because it can more effectively carry particulate and soluble pollutants to receiving waters. Increased flow velocity reduces contact time with soil and vegetation that might otherwise remove pollutants.<sup>33</sup></p>	<p>1) Quantify types and quantities of increased pollutant loadings to each affected drainage.                      2) Identify mitigation.</p>
	<p><b>E. Increased Flooding Frequency. [14]</b>                      Increased runoff and greater transport efficiency result in higher peak flows from storms of a given return period.<sup>34</sup></p>	<p>1) Quantify basin level hydrologic effect of increased runoff on each affected basin, including changes in flood return frequencies.                      2) Identify mitigation.</p>
	<p><b>F. Change in Water Temperature. [15]</b>                      Increased runoff from urban areas can raise the temperature of receiving waters because runoff from impervious surfaces is often warmer than runoff from pervious surfaces or subsurface flow.<sup>35</sup></p>	<p>1) Model increase in water temperature along stream profile of each affected drainage.                      2) Identify mitigation.</p>
	<p><b>G. Impaired Beneficial Uses. [18]</b>                      Increased runoff can impair habitat values by flushing fish and invertebrates out of streams,<sup>36</sup> increasing water level fluctuations and the velocity of flows entering wetlands,<sup>37</sup> and causing salinity changes in estuaries and other nearshore marine waters.<sup>38</sup></p>	<p>1) Identify direct effects of increased flow on aquatic biota, hydrologic regimes of adjacent wetlands, and salinity of marine receiving waters for each affected drainage.                      2) Identify mitigation.</p>
<p><b>10. CHANGE IN                      GROUNDWATER                      STORAGE</b></p>	<p><b>A. Change in Baseflow. [12]</b>                      Changes in watertable level can cause changes in the dry weather baseflow of streams fed by groundwater.<sup>39</sup></p>	<p>1) Quantify for each affected drainage the changes in baseflow associated with lowered water tables and map locations.                      2) Identify mitigation.</p>
	<p><b>B. Change in Wetland and Riparian Vegetation. [17]</b>                      A lowered watertable can dry up wetlands, stress or kill mature riparian vegetation, and reduce or eliminate seedling survival.<sup>40</sup></p>	<p>1) Identify types and areas of wetlands and riparian areas that would be affected by expected lowering of shallow water tables and map locations.                      2) Identify mitigation.</p>

CAUSE	EFFECT	NEEDED ANALYSES
<b>11. CHANNEL DESTABILIZATION</b>	<p><b>C. Impaired Beneficial Uses. [18]</b>                      A lowered watertable can impair water supply and other beneficial uses which use groundwater. Seawater intrusion is possible in coastal areas.<sup>41</sup> Aquifer compaction and subsidence can also occur.<sup>42</sup> Wetland and riparian areas can be dewatered, harming associated vegetation and habitats.<sup>43</sup></p>	<p>1) Identify affects of expected water table lowering on water supply and other beneficial uses and map locations.                      2) Identify mitigation.</p>
	<p><b>A. Channelization. [3]</b>                      Channel erosion can threaten property and structures, leading to placement of riprap or other engineered stabilization of critical sections.<sup>45</sup></p>	<p>1) Identify stream reaches in which project-induced channel destabilization may require channelization.                      2) Identify mitigation.</p>
	<p><b>B. Change in Groundwater Storage. [10]</b>                      Channel incision can dewater shallow aquifers adjacent to the channel.<sup>46</sup></p>	<p>1) Identify and map stream reaches in which project-induced stream incision may dewater shallow aquifers.                      2) Identify mitigation.</p>
	<p><b>C. Increased Pollutant Delivery. [13]</b>                      Channel erosion can result in increased suspended solids and turbidity in the water column.<sup>47</sup></p>	<p>1) Identify and map stream reaches subject to project-induced destabilization, quantify changes in channel dimension, and volume of eroded material for each affected basin.                      2) Identify mitigation.</p>
	<p><b>D. Increased Flooding Frequency. [14]</b>                      Channel aggradation can cause local flooding by diverting flows and decreasing a stream's flow capacity.<sup>48</sup></p>	<p>1) Identify and map stream reaches in which project-induced channel destabilization may cause aggradation and associated flooding.                      2) Identify mitigation.</p>
	<p><b>E. Change in Water Temperature. [15]</b>                      Bank erosion and aggradation can increase water temperature by creating a broader channel with shallow flows, increased water surface relative to flow volume, and a smaller proportion of shaded water surface. As a result, summer water temperatures and daily and seasonal temperature fluctuations tend to be greater.<sup>49</sup></p>	<p>1) Identify and map stream reaches in which project-induced destabilization can increase water temperature.                      2) Identify mitigation.</p>
<p><b>F. Change in Wetland and Riparian Vegetation. [17]</b>                      Channel destabilization can encroach on riparian wetlands and undermine streamside vegetation.<sup>50</sup></p>	<p>1) Identify, characterize, and map wetland and riparian areas subject to encroachment by channel destabilization;                      2) Identify mitigation.</p>	

CAUSE	EFFECT	NEEDED ANALYSES
12. CHANGE IN BASEFLOW	<p><b>G. Impaired Beneficial Uses. [18]</b>                      Channel destabilization can reduce or eliminate habitat, recreation, esthetic values, and other uses by affecting deep pools, pool-riffle ratios, undercut banks, substrate suitability, and other structural features.<sup>51</sup></p>	<p>1) Identify, characterize, and map stream reaches in which channel destabilization can directly impair beneficial uses.                      2) Identify mitigation.</p>
	<p><b>H. Increased Maintenance and Property Damage. [19]</b>                      Channel erosion can undermine streamside buildings, bridges, utility crossings, and other property. Aggradation can bury diversion structures and other infrastructure and may require removal to maintain flow capacity.</p>	<p>1) Identify and map stream reaches in which destabilization may cause increased maintenance and property damage.                      2) Identify mitigation.</p>
	<p><b>A. Change in Groundwater Storage. [10]</b>                      Reduced stream baseflow can decrease groundwater recharge by reducing wetted area and the amount of water available for recharge in stream channels.<sup>52</sup></p>	<p>1) Identify and map affected stream reaches.                      2) Quantify losses of recharge and water table response.                      3) Identify mitigation.</p>
	<p><b>B. Change in Water Temperature. [15]</b>                      Decreased baseflow, typically resulting from change in groundwater storage, can cause elevated and fluctuating stream temperature because groundwater usually enters the stream at cool, stable temperatures.<sup>53</sup></p>	<p>1) Identify and map affected stream reaches;                      2) Quantify temperature effects along stream profile.                      3) Identify mitigation.</p>
	<p><b>C. Change in Wetland and Riparian Vegetation. [17]</b>                      Decreased stream baseflow can cause riparian vegetation to shift to upland species.<sup>54</sup></p>	<p>1) Characterize and map affected riparian areas.                      2) Identify mitigation.</p>
<p><b>D. Impaired Beneficial Uses. [18]</b>                      1. Decreases in the amount or duration of baseflow can impair habitat quality by eliminating aquatic and riparian habitat area, reducing flow velocities, and otherwise disrupting the life cycles of plants and animals which are dependent on water.<sup>55</sup>                      2. Increases in baseflow resulting from dry weather discharge can impair waterbodies such as seasonal wetlands, vernal pools, and intermittent streams which are naturally defined by seasonal water availability.</p>	<p>1) Identify and map affected waterbody segments.                      2) Characterize and quantify changes in baseflow.                      3) Identify direct effects on beneficial uses                      4) Identify mitigation.</p>	

CAUSE	EFFECT	NEEDED ANALYSES
13. INCREASED POLLUTANT DELIVERY	<b>A. Impaired Beneficial Uses. [18]</b> Urban pollutants can impair many beneficial uses, e.g., water supply, recreation, fish and wildlife habitat, and shellfish production. <sup>56</sup>	1) Identify direct effects of increased pollutant loadings on beneficial uses in each affected waterbody segment. 2) Identify mitigation.
	<b>14. INCREASED FLOODING FREQUENCY</b>	
	<b>A. Channelization. [3]</b> Increased flooding can lead to channelization of the critical section to more efficiently pass flood flows. <sup>57</sup>	1) Identify stream reaches in which project-induced flooding may require channelization. 2) Identify mitigation.
	<b>B. Impaired Beneficial Uses. [18]</b> Increased flooding can impair habitat, <sup>58</sup> water supplies, navigation, and other beneficial uses.	1) Identify stream reaches in which project-induced flooding may impair beneficial uses. 2) Identify mitigation.
	<b>C. Increased Maintenance and Property Damage. [19]</b> Increased flood frequency can result in more maintenance and flood damage.	1) Identify stream reaches in which project-induced flooding may increase maintenance and property damage. 2) Identify mitigation.
15. INCREASED WATER TEMPERATURE	<b>A. Impaired Beneficial Uses. [18]</b> Increased water temperature can directly stress aquatic biota and can also affect other parameters associated with habitat quality, such as dissolved oxygen concentration and rate of chemical reactions. <sup>59</sup>	1) Identify and map affected waterbody segments. 2) Quantify temperature changes. 3) Characterize effects on beneficial uses. 4) Identify mitigation.
16. DECREASED POLLUTANT REMOVAL	<b>A. Increased Pollutant Delivery. [13]</b> Less removal of pollutants by natural processes can result in greater concentrations of pollutants in receiving waters. <sup>60</sup>	1) Quantify effects to pollutant loadings for each affected waterbody. 2) Identify mitigation.
17. CHANGE IN WETLAND AND RIPARIAN VEGETATION	<b>A. Channel Destabilization. [11]</b> Loss of vegetation and its associated anchoring root masses can destabilize channel banks and other geomorphic features. <sup>61</sup>	1) Characterize and map affected geomorphic features. 2) Identify mitigation.
	<b>B: Change in Water Temperature. [15]</b> Loss of riparian vegetation can increase maximum water temperature by exposing more water surface to the sun. Daily and seasonal temperature fluctuations also tend to be greater. <sup>62</sup>	1) Identify and map stream reaches in which loss of riparian vegetation can increase water temperature. 2) Identify mitigation.
	<b>C. Decreased Pollutant Removal. [16]</b> Removal of vegetation adjacent to a waterbody can reduce removal of pollutants from the waterbody and from the overland flow draining to the waterbody. <sup>63</sup>	1) Describe type, areal extent, and pollutant removal value of affected vegetation and map location. 2) Identify mitigation.

CAUSE	EFFECT	NEEDED ANALYSES
	<p><b>D. Impaired Beneficial Uses. [18]</b>                      Loss of vegetation directly impairs the quality of aquatic and riparian habitat by reducing cover, structural diversity, and nutrient sources.<sup>64</sup> Removal of vegetation can also fragment and isolate remaining patches of habitat, resulting in decreased habitat value over large areas.<sup>65</sup></p>	<ol style="list-style-type: none"> <li>1) Identify affected waterbody segments.</li> <li>2) Characterize direct effects of vegetation loss on beneficial uses.</li> <li>3) Characterize and display at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity.</li> <li>4) Identify effects of vegetation change on terrestrial and aquatic habitat connectivity.</li> <li>5) Identify mitigation.</li> </ol>



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## Low-Impact Development References

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Low-impact (LID) development generally involves more compact development that:

- minimizes generation of urban pollutants;
- preserves the amenity and other values of natural waters;
- maintains natural waters, drainage paths, landscape features and other water-holding areas to promote stormwater retention and groundwater recharge;
- designs communities and landscaping to minimize stormwater generation, runoff, and concentration; promote groundwater recharge; and reduce water demand;
- promotes water conservation and re-use.

The following documents are among many that provide more specific guidance in LID.

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Center for Watershed Protection. Better Site Design: A Handbook for Changing Development Rules in Your Community. August 1998. Online: <http://www.cwp.org/>.

Local Government Commission. The Ahwahnee Water Principles: A Blueprint for Regional Sustainability. July 2006. Online: <http://water.lgc.org/guidebook>.

Prince George's County, Maryland, Department of Environmental Protection. Low-Impact Development Design Strategies. January 2000.

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United States Environmental Protection Agency. Using Smart Growth Techniques as Stormwater Best Management Practices. EPA 231-B-05-002. December 2005.

United States Environmental Protection Agency. Parking Spaces/Community Places. EPA 231-K-06-001. January 2006.

United States Environmental Protection Agency. Protecting Water Resources with Higher Density Development. EPA 231-R-06-001. January 2006.

United States Environmental Protection Agency. Growing Toward More Efficient Water Use: Linking Development, Infrastructure, and Drinking Water Policies. EPA 230-R-06-001. January 2006.

### Further Online References:

Ca. Office of Environmental Health Hazard Assessment: <http://www.oehha.ca.gov/ecotox.html>

United States Environmental Protection Agency: <http://www.epa.gov/smartgrowth/>



State Water Resources Control Board

**Terrestrial Habitat Connectivity Related To  
Wetland, Riparian and Other Aquatic Resources,**

## Terrestrial Habitat Connectivity as Related To Wetland, Riparian, and Other Aquatic Resources

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"Habitat connectivity" refers to the need for plant and animal populations to have some mobility over the landscape, i.e., to avoid becoming "isolated" or "disjunct."<sup>1</sup> A large body of research has demonstrated that such "isolated" populations face a high probability of eventual extinction, even if their immediate habitats are spared.<sup>2</sup> In general, the smaller such an isolated population, the more quickly it will die out. Urban development typically fragments habitat by creating artificial landscapes which are movement barriers for most species. Unless mitigation measures are taken, isolated, non-viable populations are created as buildings, roads, and landscaping cut off lines of movement.

In the context of wetlands, "habitat connectivity" refers to three related phenomena:

- a. The need of some animals to have access to both wetland and upland habitats at different parts of their life cycle. Some wetland animals, e.g., some amphibians and turtles, require access at different seasons and/or at different life stages to both wetland and to nearby upland. Preserving the wetland but not access to upland habitat will locally exterminate such species.<sup>3</sup>
- b. The ecological relationship between separate wetlands. Some wetland communities and their associated species comprise networks of "patches" throughout a landscape. Wetland plants and animals are adapted to the presence of wetland complexes within a watershed and are dependent on moving among the wetlands within the complex, either regularly or in response to environmental stressors such as flood or drought, local food shortage, predator pressure, or influx of pollution. Removing one such water from the complex will reduce the biological quality of the rest, and at some point the simplified wetland complex will be incapable of supporting at least some of the species, even though some wetlands remain.<sup>4</sup>
- c. The role wetlands and riparian corridors play in allowing larger-scale movements. Some strategically located wetlands and continuous strips of riparian habitat along streams facilitate connectivity at watershed and regional scales for terrestrial as well as aquatic and amphibious species.

As noted above, habitat connectivity is critical to biodiversity maintenance, and will become more so because of global warming. Significant range shifts and other responses to global warming have already occurred. The ability of biotic populations to move across the landscape may be critical to their survival in coming decades.<sup>5</sup>

<sup>1</sup> Such mobility may occur at the level of the individual organism (e.g., a bird or turtle travelling between separated wetlands) and/or of the population (e.g., a plant species colonizing a new wetland through seed dispersal); and over different time scales.

<sup>2</sup> For the effects of habitat fragmentation and population isolation on the survival of plants and animals, see for example:

K. L. Knutson and V.L. Naef, *Management Recommendations for Washington's Priority Habitats: Riparian*, Washington Dept. of Fish and Wildlife, Olympia, WA, December 1997, p. 71.

R.F. Noss and A.Y. Cooperrider, *Saving Nature's Legacy; Protecting and Restoring Biodiversity*, Washington, D.C., Island Press, 1994, pp. 33-34, 50-54, 59-62, 61-62.

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<sup>3</sup> Regarding the relationship between wetland/riparian and upland habitats, see for example:

Vincent J. Burke and J. Whitfield Gibbons, "Terrestrial Buffer Zones and Wetland Conservation: A Case Study of Freshwater Turtles in a Carolina Bay," *Conservation Biology* 9(6), 1995, pp. 1365-1369;

C. Kenneth Dodd, Jr. and Brian S. Cade, "Movement Patterns and the Conservation of Amphibians Breeding in Small Temporary Wetlands," *Conservation Biology* 12(2), 1998, pp. 331-339;

Raymond D. Semlitsch, "Biological Delineation of Terrestrial Buffer Zones for Pond Breeding Salamanders," *Conservation Biology* 12(4), 1997, pp. 1113-1119.

Hilty, J. A. and Merenlender, A. M. Use of Riparian Corridors and Vineyards by Mammalian Predators in Northern California. *Conservation Biology* 18(1) 126-135; 2004 February.

<sup>4</sup> Regarding the ecological relationship between separated wetlands, see for example:

C. Scott Findley and Jeff Houlahan, "Anthropogenic Correlates of Species Richness in Southeastern Ontario Wetlands," *Conservation Biology* 11(4), 1997, pp. 1000-1009;

Lisa A. Joyal, Mark McCollough, and Malcom L. Hunter, Jr., "Landscape Ecology Approaches to Wetland Species Conservation: A Case Study of Two Turtle Species in Southern Maine," *Conservation Biology* 15(6), 2001, pp. 1755-1762;

Raymond D. Semlitsch and J. Russell Bodie, "Are Small, Isolated Wetlands Expendable?" *Conservation Biology* 12(5), 1998, pp. 1129-1133;

National Research Council, *op. cit.*, 2001, p. 42;

Nature Conservancy, *op. cit.*, July 2000, p. 10.

<sup>5</sup> Recent reports comprehensively review observed effects of global change on plant and animal range shifts, advancement of spring events, and other responses. See:

Terry L. Root, Jeff T. Price, Kimberly R. Hall, Stephen H. Schneider, Cynthia Rosenzweig, and Alan Pounds, "Fingerprints of Global warming on Wild Animals and Plants," *Science* 421:2, January 2003, pp. 57-60.

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Camille Parmesan and Gary Yohe, "A Globally Coherent Fingerprint of Climate Change Impacts cross Natural Systems," *Science* 421:2, January 2003, pp. 37-42.

Thomas, et al. "Extinction risk from climate change", *Nature* 427, January 2004, pp. 145-148



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# California Regional Water Quality Control Board Lahontan Region



Edmund G. Brown Jr.  
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September 14, 2011

File: Environmental Doc Review  
Los Angeles County

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### **COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GENERAL PLAN UPDATE AND ANTELOPE VALLEY AREA PLAN UPDATE, LOS ANGELES COUNTY, STATE CLEARINGHOUSE NO. 2011081042**

The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the General Plan Update and Antelope Valley Area Plan Update being prepared by Los Angeles County (County). The General Plan and Area Plan will include goals, policies, implement programs and ordinances, accommodate growth, and reduce the potential for growth in environmentally sensitive and hazardous areas.

Pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096, responsible agencies must specify the scope and content of the environmental information germane to their statutory responsibilities. Water Board staff, acting on behalf of a responsible agency, is providing these comments to help guide in the development of General and Area Plan objectives that will maintain water quality and hydrologic function, and ultimately, protect the beneficial use of waters of the State. We hope the County will consider these comments and value our position with respect to protecting and maintaining beneficial uses and high quality waters within the Lahontan Region.

### **AUTHORITY**

The State Water Resources Control Board (SWRCB) and the Water Board regulate discharges of waste in order to protect water quality and the beneficial uses of the waters of the State. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Water Board regulates the sources of water quality related problems, which could result in actual, or potential, impairment of beneficial uses or degradation of

water quality. All groundwater and surface waters are considered waters of the State. Surface waters include, but are not limited to, drainages, streams, washes, ponds, pools, or wetlands, and may be permanent or intermittent, either natural or manmade, and may or may not be identified as "blueline streams" on published topographic maps. All waters of the State are protected under California law. The Federal Clean Water Act (CWA) provides additional protection for waters of the U.S.

The Basin Plan provides guidance regarding water quality and how the Water Board may regulate activities that have the potential to affect water quality within the Region. The Basin Plan sets forth water quality standards for surface water and groundwaters of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan also identifies general types of water quality problems which can threaten beneficial uses and identifies required or recommended control measures for these problems. In some cases, it prohibits certain types of discharges in particular areas. The Basin Plan includes prohibitions and policies to achieve water quality objectives including maintaining high quality waters and beneficial uses. The Basin Plan includes a program of implementation to protect beneficial uses and to achieve water quality objectives.

The current Basin Plan was adopted by the Water Board in 1995 and has since been amended several times; the last amendment was adopted in May 2008. The Basin Plan can be accessed via the Water Board's web site at [http://www.waterboards.ca.gov/lahontan/water\\_issues/programs/basin\\_plan/references.shtml](http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml).

Implementation of the proposed Project must comply with all applicable water quality standards and prohibitions, including provisions of the Basin Plan.

## **PERMITTING**

Development within the County may require permits issued by either the SWRCB or Water Board because they have the potential to impact waters of the State. The required permits may include:

- Land disturbance of 1 acre or more may require a CWA, section 402(p) stormwater permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Stormwater Permit obtained from the SWRCB, or an individual stormwater permit obtained from the Water Board;
- Discharge of low threat wastes to a surface water, including diverted stream flows, construction and/or dredge spoils dewatering, and well construction and hydrostatic testing discharge, may require an NPDES permit for Limited Threat Discharges to Surface Waters issued by the Water Board;

- Discharge of low threat wastes to land, including clear water discharges, small dewatering projects, and inert wastes, may require General Waste Discharge Requirements (WDRs) for Discharges to Land with a Low Threat to Water Quality issued by the Water Board;
- Land disposal of waste<sup>1</sup>, including mining waste, is regulated under the California Code of Regulations (CCR), title 27, and may require Waste Discharge Requirements (WDRs) issued by the Water Board;
- Recycled water use is regulated under CCR, title 22, and may require Water Reclamation Requirements (WRRs) issued by the Water Board; and
- Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification (WQC) for impacts to federal waters (waters of the U.S.), or dredge and fill WDRs for impacts to non-federal waters, both issued by the Water Board.

Some waters of the State are "isolated" from waters of the U.S.; determinations of the jurisdictional extent of the waters of the U.S. are made by the United States Army Corps of Engineers. Projects that have the potential to impact surface waters will require the appropriate jurisdictional determinations. These determinations are necessary to discern if the proposed surface water impacts will be regulated under section 401 of the CWA or through dredge and fill WDRs issued by the Water Board.

We request that the DEIR list the permits that may be required, as outlined above, and identify the specific activities that may trigger these permitting actions in the appropriate sections of the environmental document. Information regarding these permits, including application forms, can be downloaded from our web site at <http://www.waterboards.ca.gov/lahontan/>. Also, please include information in the DEIR regarding the County's Storm Water Program and how it relates to individuals and businesses.

### **Effects of Urban Development on Water Quality**

The County's General and Area Plans are important to the Water Board because managing the water quality effects of urban development is a large part of our nonpoint source, stormwater, and water quality certification work. Most water quality impacts of urban development are best avoided by directing the location, pattern, and design of the development, rather than through traditional regulation of discharges. Many of the intractably degraded waters currently on the Water Boards' list of impaired water bodies are degraded by conditions most directly within the purview of local planning.

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<sup>1</sup> "Waste" is defined in the Basin Plan to include any waste or deleterious material including, but not limited to, waste earthen materials (such as soil, silt, sand, clay, rock, or other organic or mineral material) and any other waste as defined in the California Water Code, section 13050(d).

Watersheds are complex natural systems in which physical, chemical, and biologic components can interact to create a source of high quality water on which our economy and well-being depend. Poorly planned urban development can upset these natural interactions and degrades water quality through a web of interrelated effects. The primary impacts of poorly planned development projects on water quality can include:

- Direct Impacts – the direct physical impacts of filling and excavation on wetlands, riparian areas, and other waters;
- Pollutants – the generation of urban pollutants during and after construction;
- Hydrologic Modification – the alteration of flow regimes and groundwater recharge by impervious surfaces and stormwater collector systems;
- Watershed-level Effects – the disruption of watershed-level aquatic functions, including pollutant removal, floodwater retention, and habitat connectivity.

These impacts typically degrade water quality, increase peak flows and flooding, and destabilize stream channels; resulting in engineered solutions to the disrupted flow patterns and, ultimately, near-total loss of natural functions and values in the affected basins. Many examples of such degradation exist in California and elsewhere.

The Water Boards are mandated to prevent such degradation. CEQA establishes the process to provide the information we need to do so. Additional information is provided in the following attachments to this letter:

- Attachment 1, *Urban Development: Potential Water Quality Impacts and Required Analyses*. Outlines and diagrams the potential effects of land development on water quality and identifies related information needs.
- Attachment 2, *Low Impact Development References*. Lists documents providing guidance on principles and practices to avoid water quality and quantity problems associated with urban development.
- Attachment 3, *Terrestrial Habitat Connectivity Related To Wetland, Riparian, and Other Aquatic Resources*. Provides information and references on the importance of stream corridors, wetlands, and other waters in maintaining local and regional habitat connectivity.

### **Scope and Level of Needed Analyses**

The DEIR for the General and Area Plans should characterize the cumulative, direct, and indirect impacts to the quality of waters of the state caused by projects, which the General and Area Plans would authorize, and should identify alternatives and other mitigation measures to reduce and eliminate such impacts. Analyses should include:

#### **1. Beneficial Use Analyses**

A clear understanding of the location and nature of the waters potentially affected by this project is fundamental to fulfillment of our regulatory responsibilities. The DEIR

and General and Area Plans must include a planning area-scale map and general description based on available data of waters potentially affected by projects authorized by the General and Area Plans, tabulated and organized by watershed (drainage basin) and water body type, e.g., wetlands, riparian areas (as defined by the National Academy of Sciences)<sup>2</sup>, streams, other surface waters, and groundwater basins (a greater level of discrimination is usually appropriate, e.g., of wetland type). We request that the DEIR identify and list the beneficial uses of the identified surface water resources, as outlined in the Basin Plan, and evaluate the potential impacts to water quality with respect to those beneficial uses. The environmental document must include alternatives to avoid those impacts or list specific mitigation measures that, when implemented, minimize unavoidable impacts to a less than significant level.

## 2. Avoidance and Minimization Analysis

There are many ways projects that may be developed under the General and Area Plans can degrade water quality, and this complicates analysis. Fortunately, avoiding or minimizing any step in a pollution pathway will eliminate or reduce subsequent effects, and will simplify the associated needed analyses; and a small number of key variables control most of the pathways causing water quality degradation. We strongly encourage avoidance as the primary strategy to address water quality concerns.

Please include in the DEIR measures to avoid or minimize each potential cause of water quality degradation as described in Attachments 1 and 3 to these comments.

## 3. Alternatives Analysis

Because development projects can individually and cumulatively cause major water quality impacts, we strongly encourage a low-impact planning approach (low-impact development [LID]). Such an approach generally involves more compact development that minimizes generation of urban pollutants; preserves the amenity and other values of natural waters; maintains natural waters, drainage paths, landscape features and other water-holding areas to promote stormwater retention, pollution removal, and groundwater recharge; designs communities and landscaping to minimize stormwater generation, runoff, and concentration, promotes groundwater recharge, and reduces water demand; and promotes water conservation and re-use.

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<sup>2</sup> "Riparian areas are transitional between terrestrial and aquatic ecosystems and are distinguished by gradients in biophysical conditions, ecological process, and biota. They are areas through which surface and subsurface hydrology connect water bodies with their adjacent uplands. They include those portions of terrestrial ecosystems that significantly influence exchanges of energy and matter with aquatic ecosystems (i.e., a zone of influence). Riparian areas are adjacent to perennial, intermittent, and ephemeral streams, lakes, and estuarine-marine shorelines" (National Research Council. *Riparian Areas, Functions and Strategies for Management*. National Academy of Sciences, Washington, D.C. 2002). Riparian areas are created and maintained by periodic inundation by overbank flood flows from the adjacent surface water bodies.

Please include in the DEIR a low-impact approach for future authorized projects. Principles and practices of LID are described in the documents listed in Attachment 2, Low Impact Development References, to these comments.

#### 4. Characterization of Impacts

As noted above, we believe avoidance is the best strategy for managing potential water quality impacts. For unavoidable impacts, understanding how pollution pathways will operate is essential to managing them. Please include in the DEIR:

- a. Specify at a watershed-level of detail the causes, natures, and magnitude of impacts, which would result from projects, authorized under the General and Area Plans, referring to Attachments 1 and 3 to these comments.
- b. Quantify impacts as definitively as feasible, using appropriate modeling and adequate data. Modeling approaches should be documented, and data deficiencies or other factors affecting the reliability of the results identified and characterized.
- c. Identify whether impacts will be temporary or permanent.

#### 5. Hydrologic Analysis

Because increased runoff from developed areas is the key variable driving a number of other adverse effects, attention to maintaining the pre-development hydrograph will prevent or minimize many problems and will limit the need for other analyses and mitigation in the General and Area Plans DEIR and in subsequent project-specific EIRs. Such effects are difficult to manage at a project-specific level, and are most effectively addressed at the General Plan level.

Please include the following in the DEIR: -

- a. Alternatives and mitigation measures to maintain the pre-existing hydrology.
- b. A meaningful analysis of potential cumulative impacts to watershed hydrology from existing and planned development in the watershed or planning area.

#### 6. Habitat Connectivity Analysis

Riparian corridors and other waters within the regulatory purview of the Water Boards play an important role in maintaining habitat connectivity. Both aquatic and terrestrial habitat may be fragmented by impacts to streams, riparian areas, or other waters.

Each project should:

- a. Analyze the regional importance of movement corridors in and along water bodies, the potential effect of disrupting such corridors, and the potential for enhancing such corridors through mitigation measures.
- b. Include information regarding any sensitive plant and animal species that likely utilize the corridors.

- c. Identify any impacts to riparian or other waters that could compromise future remediation of existing connectivity barriers.
- d. To inform these analyses, consider the information and literature referenced in Attachment 3, *Terrestrial Habitat Connectivity Related To Wetland, Riparian, and Other Aquatic Resources*, including recent data on the role of riparian corridors as movement corridors in California.

### **Low Impact Development Strategies and Storm Water Control**

The foremost method of reducing impacts to surface waters and groundwater from development is "Low Impact Development" (LID), the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of nonpoint source pollutants. LID results in less surface runoff and potentially less impacts to receiving waters, the principles of which include:

- Maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge;
- Reducing the impervious cover created by development and the associated transportation network; and
- Managing runoff as close to the source as possible.

We understand that LID development practices that would maintain aquatic values could also reduce local infrastructure requirements and maintenance costs, and could benefit air quality, open space, and habitat. Vegetated areas for stormwater management and infiltration on-site are valuable in LID, and may enhance the aesthetics of the property. These principles can be incorporated into the proposed project design. We request natural drainage patterns be maintained to the extent feasible. Minimum-disturbance activities (such as preservation of vegetation and grade) are preferable to more structural (hard scape) control measures because they protect and preserve the natural drainage system. Natural drainage, including the use of vegetated buffer zones and rock swales, is the most effective means of filtering sediment and pollution and regulating the volume of runoff from land surfaces to adjacent streams, including washes.

LID practices may be more cost effective than revegetation practices or structural controls, especially long-term. Cost savings can be realized through reduced maintenance cost for stormwater infrastructure and repairs. Efforts should be made to avoid drainage channels, or to develop broad crossings if necessary, to minimize any unavoidable impacts.

Best Management Practices must be used to mitigate project impacts throughout the County. Best management practices for post-storm events need to be incorporated and monitored throughout the County to minimize erosion, deposition of sediment, and the accompanying possible degradation of water quality, increased maintenance, and property damage.

Future development should be designed to ensure that runoff is not concentrated by the proposed project, thereby preventing downstream erosion. In addition, the County could consider the establishment of mitigation areas near drainages, canyons, and river zones. Terraces and other methods of minimizing hillside disturbance for development could be incorporated with buffer zones to reduce erosion.

Projects to be developed should also indicate the final configuration of the "blue-line" streams, if applicable, and other drainages in the project vicinity. Project proponents should draw maps using an overlay feature to indicate where building pads, etc., will be placed in relation to drainages existing on the property. Each project will need to quantify these impacts, and discuss the purpose of the project, need for surface water disturbance, and alternatives (avoidance, minimize disturbances and mitigation) in their environmental document. Mitigation must be identified in the environmental document including timing of construction such that construction be limited to seasons less likely to have precipitation events.

### **Wastewater**

We also recommend that high density and/or large developments proposing to use septic tanks/leach fields be required to analyze the use of alternative wastewater treatment and disposal methods, and to conduct studies to determine the feasibility of connecting to the nearest sanitary sewer system. We suggest that community plans include unincorporated areas in order to address extension of sanitary sewer.

### **Specific Comment**

Attached to the Notice of Preparation is a Discussion of Environmental Factors for the 10<sup>th</sup> Street West Transmission Main Phase III. It is unclear how this checklist relates to the Notice of Preparation for the DEIR for the General and Area Plans. Please provide clarification as to how the checklist for the 10<sup>th</sup> Street West Transmission Main Phase III is connected to the General and Area Plans, and provide additional details in the project description referencing the activities discussed in this checklist, as well as a map showing the location of the 10<sup>th</sup> Street West Transmission Main Phase III. Please be aware that projects conducted in phases must be evaluated for environmental impacts based on the whole of the project, not just an individual phase.

### **CLOSING**

We look forward to working with you in a manner that protects water quality. If you should have any questions regarding our above or attached comments, please contact me at (760) 241-7305 ([bbergen@waterboards.ca.gov](mailto:bbergen@waterboards.ca.gov)) or Patrice Copeland, Senior Engineering Geologist, at (760) 241-7404 ([pcopeland@waterboards.ca.gov](mailto:pcopeland@waterboards.ca.gov)). The Water Board recommends that future project applicants and/or lead agencies consult with Board staff to discuss potential project impacts, including avoidance and mitigation measures. Early consultation with the Water Board is recommended, since modification of proposed projects within the County may be required to avoid or reduce impacts to hydrology and water quality.

Sincerely,



Brianna Bergen, PG  
Engineering Geologist

Attachments:

*Attachment 1, Urban Development: Potential Water Quality Impacts and Required Analyses*

*Attachment 2, Low Impact Development References*

*Attachment 3, Terrestrial Habitat Connectivity Related To Wetland, Riparian, and Other Aquatic Resources*

cc: State Clearinghouse (SCH No. 2011081042  
Thuy Hua, AICP, Los Angeles County Department of Regional Planning,  
(via email, [tnc@planning.lacounty.gov](mailto:tnc@planning.lacounty.gov))

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**PUBLIC WORKS AGENCY  
TRANSPORTATION DEPARTMENT  
Traffic, Advance Planning & Permits Division**

**MEMORANDUM**

**DATE:** August 22, 2011

**TO:** RMA – Planning Division  
Attention: Laura Hocking

**FROM:** Behnam Emami, Engineering Manager II

**SUBJECT: REVIEW OF DOCUMENT 11-022** Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the **Los Angeles County General Plan and Antelope Valley Area Plan Update**  
Lead Agency: **Los Angeles County**

Pursuant to your request, the Public Works Agency -- Transportation Department has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Los Angeles County General Plan and Antelope Valley Area Plan Update.

The project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update and Antelope Valley Area Plan Update focus growth in the unincorporated areas with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas. The project will replace the adopted General Plan (excluding the Housing Element, adopted in 2008) and the adopted Antelope Valley Area Plan.

We offer a similar comment as in our Memorandum dated January 3, 2011:

When future developments are proposed, the projects may have site specific and/or cumulative adverse traffic impacts on County of Ventura roadways. The subsequent environmental documents under the Los Angeles County General Plan and Antelope Valley Area Plan Update should include any site-specific or cumulative impact to the County of Ventura local roads and the County of Ventura Regional Road Network.

Our review is limited to the impacts this project may have on the County of Ventura Regional Road Network.

Please contact me at 654-2087 if you have questions.



**VENTURA COUNTY WATERSHED PROTECTION DISTRICT**  
PLANNING AND REGULATORY DIVISION  
800 South Victoria Avenue, Ventura, California 93009  
Tom Wolfington, Permit Manager – (805) 654-2061

**M E M O R A N D U M**

DATE: September 12, 2011

TO: Laura Hocking, RMA/Planning Technician

FROM: Tom Wolfington, P.E., Permit Manager *TW*

SUBJECT: RMA 11-022 – Notice of Preparation of Draft EIR  
Los Angeles County General Plan and Antelope Valley Area Plan  
Updates

Pursuant to your request, this office has reviewed the subject Notice of Preparation.

**PROJECT LOCATION**

Los Angeles County is geographically one of the largest counties in the country with approximately 4,083 square miles. The County stretches along 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange County and San Bernardino County, to the north by Kern County, and to the west by Ventura County. The County also includes two offshore islands, Santa Catalina Island and San Clemente Island. The unincorporated areas account for approximately 65 percent of the total land area of the County. The unincorporated areas in the northern portion of the County are covered by large amounts of sparsely populated land and include the Angeles National Forest, part of the Los Padres National Forest, and the Mojave Desert. The unincorporated areas in the southern portion of the County consist of 58 noncontiguous land areas, which are often referred to as the County's unincorporated urban islands. The Antelope Valley Planning Area is located within Los Angeles County and bounded by Kern County to the north, Ventura County to the west, the Angeles National Forest (inclusive) to the south, and San Bernardino County to the east. It excludes the Cities of Lancaster and Palmdale. This area covers approximately 1,800 square miles and includes over two dozen communities.

**PROJECT DESCRIPTION**

The proposed project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs, and ordinances. The project covers the unincorporated area of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update and Antelope Valley Area Plan Update

focus growth in the unincorporated area with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas.

**WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:**

It is noted that the Notice of Preparation includes the following passages:

“Based on the County's preliminary analysis of the project, the following environmental issues will be examined in the Program EIR: (many are checked including Hydrology/Water Quality)

The Draft EIR will address the short- and long-term effects of the Los Angeles County General Plan Update and Antelope Valley Area Plan Update on the environment. Mitigation measures will be proposed for those impacts that are determined to be significant. A mitigation monitoring program will also be developed as required by Section 15150 of the CEQA Guidelines.”

The Ventura County Watershed Protection District (District) supports the examination of the environmental issues checked, including the addressing of long-term effects.

The District is particularly interested in the evaluation of all potential effects on Ventura County.

In previous reviews related to such planning activities as One Valley One Vision, the Santa Clarita Valley Area Plan Update, and Mission Village – Newhall Ranch, the District has expressed concerns related to discussion of regional solutions to eliminate increases in stream runoff at the Ventura / Los Angeles County line; the effects of fires and erosion; the hydrological and hydraulic impacts of flood peaks, flood stages, flood velocities, and erosion and sedimentation at all flood frequencies; the basis for use of bulking factors in connection with development changes; the use of latest available hydrology data; and the impact of further development on fluvial mechanics.

**END OF TEXT**

September 14, 2011

Los Angeles County  
Dept. of Regional Planning  
Attn.: Connie Chung and Thuy Hua  
320 W. Temple Street, Rm. 1356  
Los Angeles, CA 90012

E-mail: [genplan@planning.lacounty.gov](mailto:genplan@planning.lacounty.gov) and [tnc@planning.lacounty.gov](mailto:tnc@planning.lacounty.gov)

Subject: Comments on the NOP for the County of Los Angeles General Plan Update  
and Antelope Valley Area Plan Update

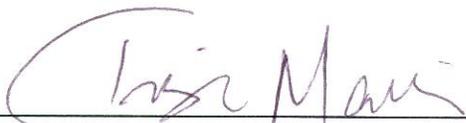
Dear Connie and Thuy:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,



Tricia Maier, Manager  
Program Administration Section

Attachment

County RMA Reference Number 11-022





## DESERT AND MOUNTAIN CONSERVATION AUTHORITY

44811 North Date Avenue, Suite G  
Lancaster, California 93534  
Phone (310) 589-3200 • Fax (310) 589-2408

Agenda Item 10(a) SMMC 8/29/11
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October 29, 2010

Ronald J. Kosinski  
Deputy District Director  
Division of Environmental Planning  
Caltrans, District 7  
100 South Main Street, Mailstop 16A (Project: HDC)  
Los Angeles, CA 90012

### **High Desert Corridor Project Scoping**

Dear Mr. Kosinski:

The Desert and Mountains Conservation Authority (DMCA) is highly concerned about the proposed High Desert Corridor Freeway/Expressway Project and its severe direct and indirect impacts on fragile desert ecology. Caltrans is proposing a brand new freeway through a largely undeveloped area prone to sprawl in an era when the national consensus has turned markedly away from such growth-inducing projects. In addition, the proposed project violates all the tenets of conservation biology by dividing the largest contiguous core habitat block in Los Angeles County. Freight movement is an important component of economic activity, which is why Caltrans' misplaced focus on alleviating future passenger vehicle traffic is disappointing. The DMCA urges a reassessment of the goals of the project and a full cost-benefit accounting of externalities from freeway construction, including the cost of fully mitigating impacts to biological resources. Alternatives that accommodate goods movement and passenger rail without subsidizing passenger vehicle travel are environmentally superior.

#### **Purpose and Need Statement Must be More Focused and Specific**

The Purpose and Need statement does not accurately characterize the nature of growth in the Antelope Valley. Growth and transportation capacity expansions have a dynamic interaction, but recent research has demonstrated almost unequivocally that capacity expansions induce growth until the system returns to equilibrium, often at the same or even worse level of congestion. Contrary to the statement's assertion that "Improvements to this corridor are considered necessary to provide for the existing and projected traffic demand attributed to residential growth and increasing developments," construction of a new multilane freeway in this corridor would induce new traffic-producing residential development that would not occur

otherwise. This proposed capacity expansion would be the cause of new development, rather than a prudent response to it. The Purpose and Need statement must be revised to reflect current understanding of the interaction between housing and transportation. A more specific focus on goods movement and passenger rail would properly focus the statement on the intended economic benefit of the project and serve as a better basis for evaluating the proposed alternatives.

### **Impacts to Biological Resources and Habitat Connectivity Must be Fully Mitigated**

The DMCA does not oppose economic development in the Antelope Valley, but is deeply committed to protecting its biological function and visual resources. Linear transportation corridors are particularly damaging to desert ecology because they divide formerly contiguous habitat blocks and drainage regimes. Over time, populations that can no longer interact with individuals on the other side of the road become genetically isolated. In other locations, specific wildlife crossing structures built after the fact partially remedy this imbalance at a cost of millions of dollars. No road has ever been built that is not a genetic barrier to some extent. While some mammals can safely cross a two-lane road with light traffic, a four-lane, high-speed freeway or expressway will all but eliminate genetic exchange without implementing extensive wildlife-specific design. The Environmental Impact Report (EIR) must conduct a thorough review of best practices for wildlife crossing design, with a particular focus on examples in other desert ecosystems. The results of this review must be incorporated into the design of all potential alternatives. The proposed project must be the most wildlife-permeable roadway ever designed.

The corridor alignment also crosses multiple desert washes of great biological importance. Freeway construction will unavoidably disturb the streambeds, but final design must minimize impacts to the hydrologic and biological function of these unique landscape features. Undercrossings must maximize stream channel width and maximize avoidance of impacts within the 100-year floodplain. Bridge openings must be designed to maximize wildlife movement. All major washes along the Los Angeles County portion of the alignment must have clear openings at least 125 feet wide with 12 feet of vertical clearance, with some support pillars as needed. The EIR must design all alternatives to maximize avoidance of hydrological impacts.

### **Project Must be Designed to Minimize Potential for Induced Growth**

In addition to the aforementioned direct impacts from roadway construction, the indirect impacts from a traditional freeway project in this corridor would be immense. Without appropriate controls, induced residential growth would sprawl along the route and overwhelm the new capacity with commuters heading to Santa Clarita, the San Fernando Valley, and Los Angeles, or east to the Inland Empire. Worse, these new trips would collect on already

overburdened freeways such as the 14, 5, and 15, prompting calls for future widening. Any induced residential growth in the corridor would eliminate the freight movement benefits of the project. The air quality and greenhouse gas impacts must be evaluated using long-term models accounting for induced demand. The EIR must also demonstrate consistency with greenhouse gas reduction goals from AB 32 and SB 375. Short-term congestion relief is not an air quality benefit if it leads to greater vehicle-miles travelled in the long term.

Of greatest concern is the habitat lost due to residential expansion into natural areas. Freeway capacity expansion encourages low-density residential development in previously inaccessible areas by lowering the economic threshold of development. The physical footprint of freeway-associated development will displace local flora and fauna and increase habitat fragmentation to the extent that development parallels the transportation corridor. If housing is developed continuously along the freeway, then even the most advanced wildlife crossing structure will not overcome this impermeable barrier. To prevent these effects, the project must include acquisition of large habitat blocks on both sides of crossing structures to protect the passages from development and edge effects that deter successful crossing.

#### **Habitat and Connectivity Loss Must be Mitigated through Acquisition**

The EIR will be deficient if it does not include an inventory and economic analysis of private parcels along the route with the potential to be developed and propose and fund a habitat acquisition plan to mitigate the impacts from induced growth. This analysis must include all parcels within two miles of the project corridor and five miles upstream and downstream along intersecting riparian corridors. To protect habitat linkages, ecosystem connectivity, and resource values, a continuous buffer area ¼-mile wide on both sides of the freeway must be acquired and transferred in fee ownership to a public land management agency such as the DMCA or Mountains Recreation and Conservation Authority (MRCA). We encourage Caltrans to work with DMCA and MRCA staff to develop an acceptable land acquisition mitigation measure.

#### **A Full Range of Freeway Alternatives and Management Scenarios Must be Considered**

Given these impacts, the DMCA must question the prudence of this project's scope. With a revised Purpose and Need statement, Caltrans can focus on lower-hanging fruit to improve goods movement without the massive environmental impact of a new freeway. TDM strategies or local intersection improvements can relieve bottlenecks using existing infrastructure at a fraction of the cost and minimal environmental impact. Safety improvements along existing routes will also reduce delays resulting from periodic traffic incidents. Any natural event that warrants closing SR 14 or 138 will also affect the new freeway, limiting its usefulness as an emergency route. Improving passenger vehicle mobility and emergency access must be removed from the Purpose and Need statement as they are either not beneficial or dubious

Mr. Ronald J. Kosinski  
High Desert Corridor Project Scoping  
October 29, 2010  
Page 4

assertions. The EIR must identify the marginal benefit in travel time and safety resulting from each proposed project feature as well as each feature's marginal cost. Externalities must be monetized to the extent possible and included as a project cost.

If the environmental analysis determines that a new transportation corridor is cost-effective, then the project must be defined in a way that maximizes its utility for goods movement while minimizing growth-inducing effects. To that end, the project should be tolled to reduce its attractiveness as a commute option while increasing its effectiveness at transporting high-value freight. There should be no local access outside of existing urban areas (only Palmdale and Victorville) and no rights for developers to build future interchanges along the route. As previously mentioned, a continuous corridor on both sides of the facility should be acquired and transferred to a public land management agency. The EIR must evaluate alternative management scenarios, including tolling, and their effect on induced growth.

#### **Infrastructure Must be Designed for Long-Term Sustainability**

The DMCA supports the project's inclusion of a rail right-of-way at this time to accommodate future infrastructure development. With multiple high-speed passenger rail projects proposed in the vicinity, it is fiscally and environmentally prudent to plan for their eventual connection now and incorporate any mitigation measures into this single project. In this way, wildlife crossings, bridge structures, and other physical improvements can be integrated to be more cost-effective and less temporally disruptive.

The DMCA does not support bisecting the fragile desert ecosystem and is extremely concerned with the growth this project will induce. Housing and transportation are inextricably related and must be analyzed accordingly. We hope to collaborate closely with your agency to minimize the environmental impacts mentioned above in the design phase. If you have any questions, I can be reached at (310) 589-3230 ext. 128.

Sincerely,



PAUL EDELMAN  
Chief of Natural Resources and Planning



**DESERT AND MOUNTAIN CONSERVATION AUTHORITY**  
44811 North Date Avenue, Suite G  
Lancaster, California 93534  
Phone (310) 589-3200 • Fax (310) 589-2408

September 29, 2011

Ms. Thuy Hua, AICP  
Senior Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, California, 90012

**Antelope Valley Area Plan Update  
Notice of Preparation of a Draft Environmental Impact Report**

Dear Ms. Hua:

The Desert and Mountain Conservation Authority (DMCA), a joint powers authority of the Antelope Valley Resource Conservation District and Santa Monica Mountains Conservancy, works to protect open space and parkland in the Antelope Valley Planning Area. The DMCA commends the County for its visionary approach to resource management and land use planning that runs throughout the draft plan. The proposed planning framework, which targets growth into existing areas with supporting infrastructure, is the *only* sustainable way for the Antelope Valley to grow. In the context of this general support, the DMCA makes the following specific comments and suggestions.

**Land Use Goals for High Desert Corridor Should be Included in Plan Update**

As stated in the plan, the High Desert Corridor (HDC) promises to transform portions of the planning area. While an exact route has yet to be determined, planning for the HDC is far enough along to develop specific land use and other strategies to mitigate its impacts. The DMCA wrote a detailed letter as part of the HDC project scoping in October of last year (attached) describing the project's potential impacts. Setting aside the merits of the project, the DMCA believes that the County should not wait to craft the principles under which the freeway will be planned and should instead proactively address land use impacts in the current plan update.

In the 2010 letter, the DMCA outlined a two-fold approach to planning for the HDC. First, the physical design of the project should minimize impacts to biological resources including clear-span bridges and other strategies to maximize the permeability of the corridor to wildlife movement. While project design is outside the scope of the plan update, general design principles are appropriate to include as plan policies.

Second, improvements to the transportation system should be evaluated in a dynamic planning relationship with land use policy. In much of Los Angeles County, freeways are constructed or widened without consideration of the land use changes that result. Capacity expansions frequently induce changes in housing and employment patterns that negate congestion-reduction benefits in just a few years after project completion. Without travel demand strategies, such as accurate pricing, and strong land use controls, regional transportation improvements fall victim to commute-related congestion.

Therefore, the DMCA requests the following additional policy:

**Policy M 6.9:** In planning for all regional transportation systems, consider and mitigate potential impacts to wildlife movement and other biological resources in project selection and design, and coordinate transportation improvements with land use strategies to minimize habitat loss and maximize connectivity.

The construction of the HDC must not prompt a departure from the vision of the plan update. The DMCA is concerned that, without strong land use controls, access to greater remote areas will induce future growth patterns typical of the pre-housing bust Antelope Valley. While the zoning of the draft plan is appropriate, the plan ominously proposes to reevaluate the land use map in conjunction with the HDC. The Land Use Element states:

A comprehensive study of the Area Plan should be undertaken when a preferred alignment for the HDC is identified and funded for construction. The study should carefully consider potential changes to the Area Plan, including the Land Use Policy Map, *balancing the need for economic development and local employment with environmental priorities*. If the study recommends changes to the Area Plan, a Plan Amendment may be initiated to adopt those changes, pursuant to the County's environmental review and public hearing procedures. (Emphasis added)

While the need for plans to reflect changes on the ground cannot be disputed, the overly broad scope of this proposed revision paves the way for future ill-advised upzoning. The 2010 DMCA letter proposed a series of land use and acquisition mitigation measures that support the draft plan's vision of a mosaic of rural communities amidst an extraordinary environmental setting. The DMCA requests that the above paragraph be revised to restate the plan update's vision and narrow the scope of future expected changes to increasing economic opportunity within existing communities. The DMCA further requests that the vision for a limited-access, freight-priority corridor surrounded by open space be incorporated into the County plan. The HDC should only provide access to existing communities and decidedly avoid growth-inducing access to rural preserve areas.

To ensure compatibility of the HDC with the plan's vision statement, the DMCA requests the following policy additions and revisions:

**Policy M 5.1:** Support the development of the High Desert Corridor to provide a route for truck traffic between Interstate 5, State Route 14, and Interstate 15. Employ travel demand strategies, such as tolls and congestion pricing, to ensure the priority of freight movement on the High Desert Corridor.

**Policy M 6.10:** Discourage new transportation improvements in rural preserve areas. Prohibit new freeway interchanges in rural preserve areas, except to provide direct access to existing rural town areas.

### **Mobility Element Should Address Biological Impacts of Transportation Infrastructure**

The DMCA strongly supports several mobility policies in the draft plan. In particular, for both rural highways and local streets, the plan minimizes road pavement widths, which decreases impacts both in terms of physical footprint and wildlife movement. Additionally, the plan discourages street lighting, which will also benefit light-sensitive ecosystems in rural areas. However, vehicle-induced mortality continues to be a leading cause of wildlife mortality in Los Angeles County, affecting common and special status species alike. Without adequate crossing facilities, roads divide habitat blocks and become population sinks. Reducing vehicle-wildlife collisions with road design is both a public safety issue and essential to preserving the Antelope Valley's extraordinary environmental setting.

To address these issues, the DMCA requests the following additional policy:

**Policy M 3.6:** In rural areas, require wildlife crossing structures to be included in rural highway projects. Encourage the use of clear-span bridges whenever feasible and enlarged culverts elsewhere. Fencing should be designed to funnel wildlife to safe crossing points.

### **Trail Dedications Require Funding for Implementation**

The draft plan includes a series of policies that strongly promote trail development throughout the Antelope Valley Plan Area. The DMCA strongly supports these policies and looks forward to working with the County to implement the Trails Plan. In the DMCA's experience, required trail dedications from developers are difficult to implement without an attached funding source. Unless dedicated trails are also funded and/or constructed, they often sit idle for years until a receiving entity can open them to the public. This constitutes a temporal loss of recreational resources and should be remedied during the development review process by requiring that trail dedications be fully-funded by the developer. Only provision of a fully-functioning trail system mitigates for impacts to recreational resources.

To address this deficiency, the DMCA requests the following revision to Policy M 10.2:

**Policy M 10.2:** Connect new developments to existing population centers with trails, requiring trail dedication through the development review and permitting process. Require that trail easements be dedicated to an open space agency or other entity acceptable to the County. Require that, when appropriate, trails be constructed or fully-funded as a development permit condition.

### **Conservation and Open Space Element Will Protect Sensitive Resources**

The Conservation and Open Space Element provides the necessary framework to conserve the Antelope Valley's unique and sensitive natural resources. The DMCA strongly supports both the general thrust and many specific policies contained within this element. Many of the strategies proposed for the County are exactly those used by the DMCA in practice. The County would benefit from adoption of these goals and policies County-wide.

The following addition would further strengthen the Conservation and Open Space Element:

**Policy COS 7.6:** Encourage agricultural activity in previously disturbed areas to reduce habitat loss.

The Open Space goals outlined in the draft plan are appropriate and beneficial. The DMCA looks forward to partnering with the County in their implementation. Minor policy changes would increase specificity and effectiveness under Goal COS 19. First, in the DMCA's experience, third-party conservation easements are a much more effective mechanism than deed restrictions for protecting open space. The DMCA is able to successfully enforce open space restrictions through this mechanism. Second, the County identifies multiple potential strategies that provide economic incentive for rural land conservation. The DMCA is strongly supportive of innovative conservation strategies, such as Transfers of Development Rights (TDR). The plan should include specificity equal to or greater than the County's Draft General Plan regarding these programs, including implementation timelines. Additionally, the Antelope Valley Plan should state the County's intention to partner with the Cities of Palmdale and Lancaster to create an inter-jurisdictional TDR program encompassing the entire Antelope Valley.

The following policy revisions would address these points:

**Policy COS 19.3:** Allow large contiguous open space areas to be distributed across individual lots so that new development preserves open space while maintaining large lot sizes that are consistent with a rural environment, provided that such open space areas are permanently protected through conservation

Ms. Thuy Hua, Senior Regional Planner  
Antelope Valley Area Plan NOP  
September 29, 2011  
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easements in favor of an open space agency or other entity acceptable to the County.

**Policy COS 19.4:** Pursue innovative strategies for open space acquisition and preservation through the land development process, such as Transfers of Development Rights, Land Banking, In-Lieu Fee Acquisition, and Mitigation Banking, provided that such strategies preserve rural character. Pursue partnerships with the Cities of Palmdale and Lancaster to establish inter-jurisdictional land conservation programs.

### **DMCA Revisions Would Strengthen Plan Update**

The above changes are minor in nature and complementary with plan's vision statement. The DMCA hopes they can be included as soon as possible to facilitate environmental review of the revised policies. The DMCA looks forward to review of the Draft Environmental Impact Report upon its availability.

The draft Antelope Valley Area Plan is truly a landmark event in the sustainable future of the Antelope Valley. It changes course from decades of poorly managed growth and charts a path forward ameliorating the environmental effects of past decisions. The County deserves credit for advancing a community-based, environmentally sound vision for the Antelope Valley's development.

If you have any questions, please contact Paul Edelman, Chief of Natural Resources and Planning, at (310) 589-3230, ext. 128.

Sincerely,



JIM DODSON  
Chair

Attachment



DEPARTMENT OF FISH AND GAME

South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
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September 20, 2011

SEP 22 2011

Mr. Richard Bruckner, Director  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

**Subject: Agricultural Clearing particularly within the Antelope Valley;  
Notice of Preparation for a Draft Programmatic Environmental Impact  
Report for Los Angeles County General Plan and Antelope Valley Area  
Plan SCH # 2011081042**

Dear Mr. Bruckner:

The Department of Fish and Game (Department) recently submitted our NOP comments, dated September 14, 2011, for the Draft Programmatic Environmental Impact Report for Los Angeles County General Plan and Antelope Valley Area Plan SCH # 2011081042 (Plans). We wanted to take this opportunity as Los Angeles County (County) is revising their Plans, to specifically address issues related to agricultural clearing, particularly in the Antelope Valley. We recommend that the County address these issues in the upcoming revisions to the Plans.

The Department is very concerned regarding the historic and continued loss and degradation of biological and botanical resources held in public trust by the Department within the west Mojave Desert of the unincorporated areas of the County. The Department is particularly concerned regarding ongoing direct and cumulative adverse environmental impacts to the biological diversity in the Antelope Valley resulting from agricultural clearing activities. Agricultural clearing, unless conducted within a Significant Ecological Area (SEA), is normally not subject to County review under the California Environmental Quality Act (CEQA) because such activity is exempted from discretionary action by the County (not considered a project under CEQA). CEQA was adopted in 1970 as a statute requiring state, county, and city governments to assess the potential for negative environmental impacts associated with proposed private developments and to assess avoidance and mitigation measures.

The lack of discretionary regulatory oversight by the County has resulted in ongoing significant, direct, and cumulative losses of important representative elements of the natural heritage and biological diversity of the County, including species listed as threatened and/or endangered under the California Endangered Act (CESA) and Federal Endangered Species Act (FESA). In the Antelope Valley, state and federal listed species include but are not limited to Mohave ground squirrel, Mojave desert tortoise, and Swainson's hawk. Agricultural clearing also adversely impacts other special status species including but not limited to western burrowing owl, American badger, tricolored blackbird, coast horned lizard and special status botanical resources such as Joshua tree woodland, saltbush scrub, and several plant species upon which adverse impacts would be considered significant under a comprehensive CEQA review process. Several of the

species referenced above are found nowhere else in the County. Western burrowing owl is a species which has disappeared as a breeding population from the entire County except for the Antelope Valley.

The lack of discretionary oversight of agricultural clearing has also placed an inequitable burden for environmental compliance and mitigation costs upon private and public entities who are not afforded exemptions from the CEQA process and for whose direct project disturbance footprints are often much smaller than the several hundred-acre agricultural clearing operations that are typical in the Antelope Valley. The continued loss of habitat in the Antelope Valley for sensitive species not presently listed under CESA or FESA may accelerate the necessity of future listings for these species and greater regulatory oversight.

Agricultural clearing may not be exempt from state and/or federal incidental take authorization under CESA and FESA, from Section 1600 *et seq.* of the California Fish and Game Code relating to the alteration of Department jurisdictional drainages or lakes, nor from state and federal laws protecting native birds species. Unlike activities that are subject to CEQA, County-exempted agricultural clearing activities are not brought to the attention of natural resource agencies or the public because there are no requirements that these entities be publicly noticed of such activity. The lack of CEQA oversight at the County level for agricultural clearing also frequently results in no biological assessment being required to determine impacts to special status species and jurisdictional waters of the state in order to plan for appropriate avoidance, mitigation measures and regulatory compliance. This blanket exemption of oversight makes it very difficult for the Department to protect public trust resources, contributes to violations of law, and furthers unmitigated loss of biological diversity.

The Department understands that large-scale unregulated and unauthorized agricultural clearing of native vegetation has resulted in unacceptable impacts to biodiversity within the Antelope Valley. Particularly troubling is that some of these activities include hundreds of acres within County SEAs which were apparently not known by the County until after adverse impacts to biological and botanical resources had already occurred. From an environmental perspective, any further unregulated, unauthorized and unmitigated clearing of public trust resources for agricultural purposes within this area cannot be supported on a biologically sustainable level and is a matter of very serious concern to the Department. To illustrate the Department's concern, examples of agricultural-related clearing of biologically diverse habitats in the west Mojave of the County include, but are not limited to:

1. A grading violation occurred on an agricultural-leased portion of the Red Dawn Sun Tower LLC property, partially within the Joshua Tree Significant Ecological Area # 60. A private citizen alerted the County on March 9, 2009 regarding their concern over the grading. The 540-acre property is located along Avenue B and W. 200<sup>th</sup> Street. Grading occurred on approximately 325 acres of the property. Of the 325 acres, 95.44 acres were Joshua Trees (63.86 acres of Joshua Trees occurred in the SEA #60). Under current County code, it is the Department's understanding that the remainder of the clearing within habitat outside the SEA will not be considered for any remediation

discussion under the Conditional Use Permit for the solar energy project proposed for this site.

2. The Department observed agricultural activity located on 693.36 acres within SEA #55 (Desert Montane Transect) in the eastern edge of the County within the previously proposed Gray Butte Solar Array project which was under review by the Los Angeles County Department of Regional Planning. According to aerial imagery on Google Earth, the parcel supported native desert vegetation and Department jurisdictional drainages prior to the complete clearing of the parcel between August 2005 and October 2005. This clearing appears to have occurred without any County regulatory oversight or knowledge. The Department is very concerned that the conversion of the habitat within SEA #55 resulted in a significant impact to biological resources because the parcel to the immediate west is occupied by desert tortoise, and Mohave ground squirrel is known to occur in the vicinity. The Department brought its concern to County zone enforcement and was advised that nothing could probably be done to address any unauthorized clearing within the SEA because the statute of limitations had probably expired for County enforcement of any grading code violation applicable to destruction of the SEA.

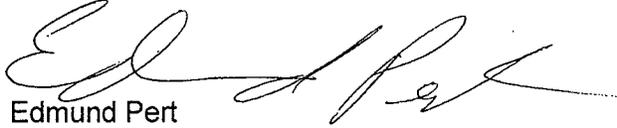
In order to proactively address the Department's concerns relative to the current lack of County regulatory oversight of biologically damaging agricultural clearing, and to assist in compliance with state and federal law and existing county codes applicable to the protection of County SEAs, the Department would like to make the following recommendations:

1. The County should codify discretionary approval measures to protect biological diversity in the Antelope Valley that is being lost to unregulated agricultural activities within areas outside of SEAs. Specifically agricultural clearing should be considered by the County as a project subject to CEQA review with appropriate consideration given to impacts assessment, avoidance and mitigation measures to reduce impacts below a level of significance under CEQA.
2. The County should devote a greater effort to monitor unauthorized clearing within SEAs and address these activities in a timely manner so that appropriate enforcement and corrective measures may be employed to reduce further damage and mitigate for the loss of biological resources. At a minimum, SEAs should regularly be evaluated for integrity within a timeframe so as not to exceed any statute of limitation for enforcement purposes.
3. All SEAs should be specified as such in property deeds that run with the property, with language explaining that altering of said property may be subject to discretionary action by the County.
4. Compliance with state and federal regulatory resource agency laws should be verified by the County prior to awarding discretionary approval for agricultural clearing.

The Department appreciates the County's attention to the Department's concerns and recommendations, and is hopeful that the County will initiate a dialogue with the Department to facilitate timely action on this issue.

Please contact Mr. Scott Harris, Environmental Scientist at (626) 797-3170 if you have any questions or for further coordination on this matter.

Sincerely,



Edmund Pert  
Regional Manager  
South Coast Region

cc: Department of Fish and Game  
Ms. Leslie MacNair, Laguna Hills  
Ms. Terri Dickerson, Laguna Niguel  
Ms. Kelly Schmoker, Pasadena  
Ms. Sarah Rains, Newbury Park

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Los Angeles County Supervisor - 5<sup>th</sup> District.  
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Los Angeles County Department of Regional Planning  
Mr. Mitch Glaser  
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Mr. Mike Plaziak,  
Supervising Engineering Geologist, PG  
South Lahontan Watersheds Division  
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State of California - The Natural Resources Agency  
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EDMUND G. BROWN, JR. Governor  
CHARLTON H. BONHAM, Director



September 14, 2011

Ms. Connie Chung  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 9012  
Fax #: (213) 217-5108

**Subject: Notice of Preparation for a Draft Programmatic Environment impact Report for Los Angeles County General Plan and Antelope Valley Area Plan, SCH # 2011081042, Los Angeles County**

Dear Ms. Chung:

The Department of Fish and Game (Department) has received the Notice of Preparation (NOP) of a Draft Programmatic Environmental Impact Report (DPEIR) for the comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The Los Angeles County General Plan serves as the framework for existing community-based plans, including Area Plans, Community Plans, Neighborhood Plans, and Local Coastal Land Use Plans. The General Plan Update and Antelope Valley Area Plan Update focus growth in the unincorporated areas with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas. The project includes goals, policies, implementing programs and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region.

The project will replace the adopted General Plan (excluding the Housing Element, adopted in 2008) and the Antelope Valley Area Plan which was adopted in 1986. As a component of the Los Angeles County General Plan, the Antelope Valley Area Plan refines the countywide goals and policies in the General Plan by addressing specific issues relevant to the Antelope Valley, such as community maintenance and appearance, preservation of rural character, open space, and agricultural lands, and provides more specific guidance on elements already found in the General Plan. All issues not covered in the Area Plan are addressed by the General Plan.

The Department is California's Trustee Agency for fish and wildlife resources, holding these resources in trust for the People of the State pursuant to various provisions of the California Fish and Game Code. (Fish & G. Code, §§ 711.7, subd. (a), 1802.) The Department submits these comments in that capacity under the California Environmental Quality Act (CEQA). (See generally Pub. Resources Code, §§ 21070; 21080.4.) Given its related permitting authority under the California Endangered Species Act (CESA) and Fish and Game Code section 1600 *et seq.*, the Department also submits these comments likely as a Responsible Agency for the project under CEQA. (*Id.*, § 21069.)

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September 14, 2011  
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In addition, the Department also administers the Natural Community Conservation Planning Act (NCCP) Act (Fish and Game Code section 2800 *et seq.*). The Desert Renewable Energy Conservation Plan (DRECP), a NCCP/Habitat Conservation Plan (HCP), is under development. The Planning Area for the DRECP encompasses the entire west Mojave, including the County of Los Angeles. Although the County is not a permittee to the NCCP at this time, CEQA requires (Appendix G, CEQA Guidelines) the Lead Agency to analyze the proposed project's impacts to an NCCP or other regional planning document.

The California Wildlife Action Plan, a recent Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) altered fire regimes; and 5) recreational pressures. The Department has worked and continues to work with the County in coordinating conservation strategies for biological resources and looks forward to working with the Lead Agency to minimize impacts to fish and wildlife resources with a focus on these stressors. Please let Department staff know if you would like a copy of the California Wildlife Action Plan to review.

The Department supports the County's development of a General Plan and Antelope Valley Area Plan to address solar and wind development in the Antelope Valley in a regional manner. On a regional level, and as part of the State's commitment to SB 32, the Department is working with stakeholders (including local governments, environmental groups, renewable energy developers) and other State and federal agencies to complete the DRECP. The purpose of the DRECP is to facilitate permit streamlining of renewable energy projects while providing a large-scale conservation strategy for the biological resources of the Planning Area, which includes the Mojave and Sonoran deserts of California. The portion of the Antelope Valley within the County is within the boundary of the Planning Area. The Department encourages the County to utilize current resources on the DRECP website (see website at [www.drecp.org](http://www.drecp.org)) drafted by the Renewable Energy Action Team (REAT). The REAT's founding members include the California Energy Commission, the Bureau of Land Management, the US Fish and Wildlife Service and the Department. The REAT developed the *Best Management Practices and Guidance Manual* ("BMP Guidance Manual", located on the website) to provide guidance to project proponents, which includes detailed measures to avoid, minimize, and mitigate impacts to sensitive species known to occur within the Planning Area. The Department recommends the County utilize the BMP Guidance Manual in its efforts to address impacts to biological resources from wind and solar projects.

The Department appreciates the County's efforts in collaborating on measures to minimize impacts to biological resources. To enable Department staff to adequately review and comment on the proposed project we recommend the following information, where applicable, be included in the DPEIR:

1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.
  - a) A thorough recent assessment of rare plants and rare natural communities,

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- following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (See Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities at: <http://www.dfg.ca.gov/habcon/plant/>).
- b) A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use within the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.
  - c) Endangered, rare, and threatened species to address should include all those species which meet the related definition under the CEQA Guidelines. (See Cal. Code Regs., tit. 14, § 15380.)
  - d) The Department's Biogeographic Data Branch in Sacramento should be contacted at (916) 322-2493 ([www.dfg.ca.gov/biogeodata](http://www.dfg.ca.gov/biogeodata)) to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area must be addressed.
2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.
- a) CEQA Guidelines, Section 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
  - b) Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas are of concern to the Department and should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic, outdoor artificial lighting, noise and vibration and pest management.
  - c) A cumulative effects analysis should be developed as described under CEQA Guidelines, Section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
  - d) Impacts to migratory wildlife affected by the project should be fully evaluated including proposals to remove/disturb native and ornamental landscaping and other nesting habitat for native birds. Impact evaluation may also include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the

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- California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.
- e) Impacts to all habitats from City or County required Fuel Modification Zones (FMZ). Areas slated as mitigation for loss of habitat shall not occur within the FMZ.
  - f) Proposed project activities (including but not limited to, staging and disturbances to native and non-native vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from March 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If project activities cannot avoid the avian breeding season, nest surveys should be conducted and active nests should be avoided and provided with a minimum buffer as determined by a biological monitor (the Department generally recommends a minimum 300 foot nest avoidance buffer (or 500 feet for all active raptor nests).
3. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources including wetlands/riparian habitats, alluvial scrub and coastal sage scrub, should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.
- a) Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed with off-site mitigation locations clearly identified. For example, early consultation with the Department is recommended in order to plan for avoidance and/or mitigation measures for western spadefoot because this species is difficult to detect during seasonal drought conditions. Surveys and measures to avoid, salvage, preserve and/or create artificial seasonal ponds should be implemented during seasons with ample rainfall that promotes detection of this species.
  - b) The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts (Attachment).
  - c) The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.
4. An Incidental Take Permit from the Department may be required if the project, project construction, or any project-related activity during the life of the project that will result in "take" as defined by the Fish and Game Code of any species protected by CESA. (Fish & G. Code, §§86, 2080, 2081, subd. (b), (c).) Early consultation with Department regarding potential permitting obligations under CESA with respect to the project is encouraged. (Cal. Code Regs., tit. 14, § 783.2, subd. (b).) It is imperative with these potential permitting obligations that the draft environmental impact report prepared by the Lead Agency in the present case includes a thorough and robust analysis of the potentially significant impacts to endangered, rare, and threatened species, and their habitat, that may occur as a result of the proposed project. For any such potentially

Ms. Connie Chung  
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significant impacts the Lead Agency should also analyze and describe specific, potentially feasible mitigation measures to avoid or substantially lessen any such impacts as required by CEQA and, if an ITP is necessary, as required by the relevant permitting criteria prescribed by Fish and Game Code section 2081, subdivisions (b) and (c). The failure to include this analysis in the project environmental impact report could preclude the Department from relying on the Lead Agency's analysis to issue an ITP without the Department first conducting its own, separate lead agency subsequent or supplemental analysis for the project. (See, e.g., Cal. Code Regs., tit. 14, § 15096, subd. (f); Pub. Resources Code, § 21166.) For these reasons, the following information is requested:

- a) Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
  - b) A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.
5. The Department opposes the elimination of watercourses (including concrete channels, blue-line streams and other watercourses not designated as blue-line streams on USGS maps) and/or the canalization of natural and manmade drainages or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations. The Department recommends a minimum natural buffer of 100 feet from the outside edge of the riparian zone on each side of drainage.
- a) The Department also has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) or a river or stream or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of an LSA is a project subject to CEQA. To facilitate issuance of an Agreement, if necessary, the environmental impact report should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the Agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. Again, the failure to include this analysis in the project environmental impact report could preclude the Department from relying on the Lead Agency's analysis to issue an Agreement without the Department first conducting its own, separate lead agency subsequent or supplemental analysis for the project.

Finally, the Department has additional comments regarding our concerns over loss of habitat from agricultural practices. We will submit a separate letter addressing those issues.

Ms. Connie Chung  
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Thank you for this opportunity to provide comments. Please contact Mr. Scott Harris, Environmental Scientist at (626) 797-3170 if you should have any questions and for further coordination on the proposed project.

Sincerely,



Edmund Pert  
Regional Manager  
South Coast Region

Attachment

cc: Department of Fish and Game  
Ms. Leslie MacNair, Laguna Hills  
Ms. Terri Dickerson, Laguna Niguel  
Ms. Kelly Schmoker, Pasadena  
Ms. Erinn Wilson, Huntington Beach  
Mr. Scott Harris, Pasadena

State Clearinghouse, Sacramento

Los Angeles County  
Department of Regional Planning  
Ms. Thuy Hua  
320 West Temple Street  
Los Angeles, CA 9012

### Sensitivity of Top Priority Rare Natural Communities in Southern California

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

- S1.# Fewer than 6 known locations and/or on fewer than 2,000 acres of habitat remaining.
- S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.
- S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

- S1.1 = very threatened
- S2.2 = threatened
- S3.3 = no current threats known

#### Sensitivity Rankings (February 1992)

<u>Rank</u>	<u>Community Name</u>
S1.1	Mojave Riparian Forest
	Sonoran Cottonwood Willow Riparian
	Mesquite Bosque
	Elephant Tree Woodland
	Crucifixion Thorn Woodland
	Allthorn Woodland
	Arizonan Woodland
	Southern California Walnut Forest
	Mainland Cherry Forest
	Southern Bishop Pine Forest
	Torrey Pine Forest
	Desert Mountain White Fir Forest
	Southern Dune Scrub
	Southern Coastal Bluff Scrub
	Maritime Succulent Scrub
	Riversidean Alluvial Fan Sage Scrub
	Southern Maritime Chaparral
	Valley Needlegrass Grassland
	Great Basin Grassland
	Mojave Desert Grassland
	Pebble Plains
	Southern Sedge Bog
	Cismontane Alkali Marsh

- S1.2  
Southern Foredunes  
Mono Pumice Flat  
Southern Interior Basalt Flow Vernal Pool
- S2.1  
Venturan Coastal Sage Scrub  
Diegan Coastal Sage Scrub  
Riversidean Upland Coastal Sage Scrub  
Riversidean Desert Sage Scrub  
Sagebrush Steppe  
Desert Sink Scrub  
Mafic Southern Mixed Chaparral  
San Diego Mesa Hardpan Vernal Pool  
San Diego Mesa Claypan Vernal Pool  
Alkali Meadow  
Southern Coastal Salt Marsh  
Coastal Brackish Marsh  
Transmontane Alkali Marsh  
Coastal and Valley Freshwater Marsh  
Southern Arroyo Willow Riparian Forest  
Southern Willow Scrub  
Modoc-Great Basin Cottonwood Willow Riparian  
Modoc-Great Basin Riparian Scrub  
Mojave Desert Wash Scrub  
Engelmann Oak Woodland  
Open Engelmann Oak Woodland  
Closed Engelmann Oak Woodland  
Island Oak Woodland  
California Walnut Woodland  
Island Ironwood Forest  
Island Cherry Forest  
Southern Interior Cypress Forest  
Bigcone Spruce-Canyon Oak Forest
- S2.2  
Active Coastal Dunes  
Active Desert Dunes  
Stabilized and Partially Stabilized Desert Dunes  
Stabilized and Partially Stabilized Desert Sandfield  
Mojave Mixed Steppe  
Transmontane Freshwater Marsh  
Coulter Pine Forest  
Southern California Fellfield  
White Mountains Fellfield
- S2.3  
Bristlecone Pine Forest  
Limber Pine Forest

**SANTA MONICA MOUNTAINS CONSERVANCY**

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August 29, 2011

Mr. Mitch Glaser, AICP  
Supervising Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Preliminary Draft Antelope Valley Area Plan**

Dear Mr. Glaser:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State planning agency in the Rim of the Valley Zone, which includes a large portion of the Antelope Valley Planning Area. The Conservancy commends the County for the visionary approach to resource management and land use planning that runs throughout the draft plan. The planning framework that targets growth into existing areas with supporting infrastructure is the *only* sustainable way for the Antelope Valley to grow. In the context of this general support, the Conservancy makes the following specific comments and suggestions.

**Land Use Goals for High Desert Corridor Should be Included in Plan Update**

As stated in the plan, the High Desert Corridor (HDC) promises to transform portions of the planning area. While an exact route has yet to be determined, planning for the HDC is far enough along to develop specific land use and other strategies to mitigate its impacts. The Desert and Mountain Conservation Authority (DMCA), a joint-powers partner of the Conservancy, wrote a detailed letter as part of the HDC project scoping in October of last year (attached). The Conservancy shares DMCA's assessment of the project's potential impacts. Setting aside the merits of the project, the Conservancy believes that the County should not wait to craft the principles under which the freeway will be planned and should instead proactively address land use impacts in the current plan update.

The DMCA outlines a two-fold approach to planning for the HDC. First, the physical design of the project should minimize impacts to biological resources including clear-span bridges and other strategies to maximize the permeability of the corridor to wildlife movement. While project design is outside the scope of the plan update, general design principles are appropriate to include as plan policies.

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Second, improvements to the transportation system should be evaluated in a dynamic planning relationship with land use policy. In much of Los Angeles County, freeways are constructed or widened without consideration of the land use changes that result. Capacity expansions frequently induce changes in housing and employment patterns that negate congestion-reduction benefits in just a few years after project completion. Without travel demand strategies, such as accurate pricing, and strong land use controls, regional transportation improvements fall victim to commute-related congestion.

Therefore, the Conservancy requests the following additional policy:

**Policy M 6.9:** In planning for all regional transportation systems, consider and mitigate potential impacts to wildlife movement and other biological resources in project selection and design, and coordinate transportation improvements with land use strategies to minimize habitat loss and maximize connectivity.

The construction of the HDC must not prompt a departure from the vision of the plan update. The Conservancy is concerned that, without strong land use controls, access to greater remote areas will induce future growth patterns typical of the pre-housing bust Antelope Valley. While the zoning of the preliminary draft plan is appropriate, the plan ominously proposes to reevaluate the land use map in conjunction with the HDC. The Land Use Element states:

A comprehensive study of the Area Plan should be undertaken when a preferred alignment for the HDC is identified and funded for construction. The study should carefully consider potential changes to the Area Plan, including the Land Use Policy Map, *balancing the need for economic development and local employment with environmental priorities*. If the study recommends changes to the Area Plan, a Plan Amendment may be initiated to adopt those changes, pursuant to the County's environmental review and public hearing procedures. (Emphasis added)

While the need for plans to reflect changes on the ground cannot be disputed, the overly broad scope of this proposed revision paves the way for future ill-advised upzoning. The DMCA letter proposes a series of land use and acquisition mitigation measures that support the preliminary draft plan's vision of a mosaic of rural communities amidst an extraordinary environmental setting. The Conservancy requests that the above paragraph be revised to

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restate the plan update's vision and narrow the scope of future expected changes to increasing economic opportunity within existing communities. The Conservancy further requests that the DMCA's vision for a limited-access, freight-priority corridor surrounded by open space be incorporated into the County plan. The HDC should only provide access to existing communities and decidedly avoid growth-inducing access to rural preserve areas.

To ensure compatibility of the HDC with the plan's vision statement, the Conservancy requests the following policy additions and revisions:

**Policy M 5.1:** Support the development of the High Desert Corridor to provide a route for truck traffic between Interstate 5, State Route 14, and Interstate 15. Employ travel demand strategies, such as tolls and congestion pricing, to ensure the priority of freight movement on the High Desert Corridor.

**Policy M 6.10:** Discourage new transportation improvements in rural preserve areas. Prohibit new freeway interchanges in rural preserve areas, except to provide direct access to existing rural town areas.

### **Mobility Element Should Address Biological Impacts of Transportation Infrastructure**

The Conservancy strongly supports several mobility policies in the draft plan. In particular, for both rural highways and local streets, the plan minimizes road pavement widths, which decreases impacts both in terms of physical footprint and wildlife movement. Additionally, the plan discourages street lighting, which will also benefit light-sensitive ecosystems in rural areas. However, vehicle-induced mortality continues to be a leading cause of wildlife mortality in Los Angeles County, affecting common and special status species alike. Without adequate crossing facilities, roads divide habitat blocks and become population sinks. Reducing vehicle-wildlife collisions with road design is both a public safety issue and essential to preserving the Antelope Valley's extraordinary environmental setting.

To address these issues, the Conservancy requests the following additional policy:

**Policy M 3.6:** In rural areas, require wildlife crossing structures to be included in rural highway projects. Encourage the use of clear-span bridges whenever feasible and enlarged culverts elsewhere. Fencing should be designed to funnel wildlife to safe crossing points.

### **Trail Dedications Require Funding for Implementation**

The draft plan includes a series of policies that strongly promote trail development throughout the Antelope Valley Plan Area. The Conservancy strongly supports these policies and looks forward to working with the County and DMCA to implement the Trails Plan. In the Conservancy's experience, required trail dedications from developers are difficult to implement without an attached funding source. Unless dedicated trails are also funded and/or constructed, they often sit idle for years until a receiving entity can open them to the public. This constitutes a temporal loss of recreational resources and should be remedied during the development review process by requiring that trail dedications be fully-funded by the developer. Only provision of a fully-functioning trail system mitigates for impacts to recreational resources.

To address this deficiency, the Conservancy requests the following revision to Policy M 10.2:

**Policy M 10.2:** Connect new developments to existing population centers with trails, requiring trail dedication through the development review and permitting process. Require that trail easements be dedicated to an open space agency or other entity acceptable to the County. Require that, when appropriate, trails be constructed or fully-funded as a development permit condition.

### **Conservation and Open Space Element Will Protect Sensitive Resources**

The Conservation and Open Space Element provides the necessary framework to conserve the Antelope Valley's unique and sensitive natural resources. The Conservancy strongly supports both the general thrust and many specific policies contained within this element. Many of the strategies proposed for the County are exactly those used by the Conservancy and its joint-powers partners in practice. The County would benefit from adoption of these goals and policies County-wide.

The following addition would further strengthen the Conservation and Open Space Element:

**Policy COS 7.6:** Encourage agricultural activity in previously disturbed areas to reduce habitat loss.

The Open Space goals outlined in the draft plan are appropriate and beneficial. The Conservancy looks forward to partnering with the County in their implementation. Minor policy changes would increase specificity and effectiveness under Goal COS 19. First, in the Conservancy's experience, third-party conservation easements are a much more effective mechanism than deed restrictions for protecting open space. The Conservancy's joint-powers partners, including the DMCA and Mountains Recreation and Conservation Authority, are able to successfully enforce open space restrictions through this mechanism. Second, the County identifies multiple potential strategies that provide economic incentive for rural land conservation. The Conservancy is strongly supportive of innovative conservation strategies, such as Transfers of Development Rights (TDR). The plan should include specificity equal to or greater than the County's Draft General Plan regarding these programs, including implementation timelines. Additionally, the Antelope Valley Plan should state the County's intention to partner with the Cities of Palmdale and Lancaster to create an inter-jurisdictional TDR program encompassing the entire Antelope Valley.

The following policy revisions would address these points:

**Policy COS 19.3:** Allow large contiguous open space areas to be distributed across individual lots so that new development preserves open space while maintaining large lot sizes that are consistent with a rural environment, provided that such open space areas are permanently protected through conservation easements in favor of an open space agency or other entity acceptable to the County.

**Policy COS 19.4:** Pursue innovative strategies for open space acquisition and preservation through the land development process, such as Transfers of Development Rights, Land Banking, In-Lieu Fee Acquisition, and Mitigation Banking, provided that such strategies preserve rural character. Pursue partnerships with the Cities of Palmdale and Lancaster to establish inter-jurisdictional land conservation programs.

### **Renewable Energy Map Missing Key Wildlife Corridor**

The draft Renewable Energy Priority Production Map does not include a wildlife corridor in the Vincent Grade vicinity that runs parallel to the Antelope Valley-Santa Clara River watershed boundary. This area is currently proposed to be included in the High Priority Zone, however it forms a critical narrow habitat linkage between development in Acton and the Palmdale urban area. Energy projects in this area must be carefully sited to avoid

Mr. Mitch Glaser, Supervising Regional Planner  
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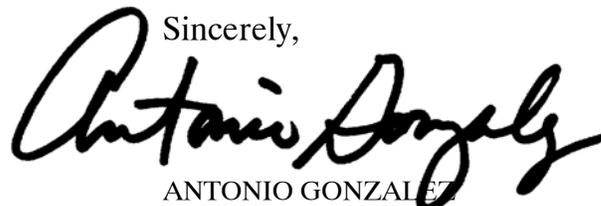
severing this linkage. This area may not be appropriate for a High Priority Zone designation for this reason.

**Conservancy Requests Changes to be Made Prior to DEIR**

The above changes are minor in nature and complementary with plan's vision statement. Therefore, the Conservancy requests that they be made to the plan prior to conducting the draft environmental impact report (DEIR).

The draft Antelope Valley Area Plan is truly a landmark event in the sustainable future of the Antelope Valley. It changes course from decades of poorly managed growth and charts a path forward ameliorating the environmental effects of past decisions. The County deserves credit for advancing a community-based, environmentally sound vision for the Antelope Valley's development.

If you have any questions, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at (310) 589-3200, ext. 128.

Sincerely,  
  
ANTONIO GONZALEZ  
Chairperson

Attachment

## SANTA MONICA MOUNTAINS CONSERVANCY

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April 30, 2001

George Malone, Section Head  
General Plan Development Section  
Los Angeles County, Department of Regional Planning  
320 West Temple Street, Room 13<sup>th</sup> Floor  
Los Angeles, California 90012

Comments on Los Angeles County  
Significant Ecological Area Update Study

Dear Mr. Malone:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Los Angeles County Significant Ecological Area Update Study 2000 documents prepared by the consultant team for the County of Los Angeles (County) (PCR *et al.* 2000a, 2000b). The County is revising the boundaries and regulatory policies for the existing 61 Significant Ecological Areas (SEAs) as part of the General Plan update effort. The objective of the SEA program has been expanded to include the future sustainability of biotic diversity in the County through the application of more current practices in conservation biology, primarily by consolidation into larger, interconnected SEAs (PCR *et al.* 2000b).

The Conservancy commends the County and the consultant team on the excellent work done for the SEA Update Study and specifically on the efforts to propose more inclusive and biologically sound SEAs. The County and consultant team have made great strides in this effort and are moving in the right direction. The Conservancy offers the following specific comments, and we look forward to working with the County and other interested parties to include the SEAs in the General Plan as recommended by the consultants.

Full Support for Specific SEA Expansions

The Conservancy fully supports the consultants' proposal to expand several existing SEAs, including the following: Santa Monica Mountains, San Andreas Rim Zone, Antelope Valley, Santa Clara River, and the East San Gabriel Valley. The entire Santa Monica Mountains range represents the nation's premier example of a Mediterranean ecosystem and meets all of the criteria for inclusion as an SEA. The San Andreas Rim Zone encompasses several regionally significant linkages for wildlife movement and globally unique vegetation communities. The proposed Antelope Valley SEA provides crucial

connectivity for wildlife movement, encompassing open washes, historic floodplains, riparian communities, desert scrub, and Joshua tree woodlands (PCR *et al.* 2000b). Along the Santa Clara River, which is known to support numerous state and federally-listed species, the SEA boundary was proposed to be expanded along the western and northwestern edge of the Angeles National Forest, both inside and outside of the forest boundary. The proposed East San Gabriel Valley SEA contains critical habitat and a core population of the federally threatened coastal California gnatcatcher (*Polioptila californica californica*), and supports numerous plant communities restricted in distribution.

#### Maximum Inclusion of SEAs in Incorporated Areas

Some proposed SEAs that were studied included areas within a city jurisdiction while some SEAs were not studied because they occurred within a city jurisdiction. Some cities recognize the importance of existing SEAs in their General Plans, Zoning Ordinances, and special protective guidelines (PCR *et al.* 2000a). In coordination with other jurisdictions, the County should analyze the areas of existing SEAs within city jurisdictions in the geographic limits of Los Angeles County. At the very least, these areas of SEAs should be retained, as recommended by the consultant team (p. v; PCR *et al.* 2000a). For example, the Griffith Park existing SEA No. 37 was not studied because it is entirely within the City of Los Angeles jurisdiction (PCR *et al.* 2000a). Griffith Park and any remaining contiguous habitat should be included. Tujunga Valley/Hansen Dam and Verdugo Mountains existing SEAs should also be retained. In addition, because Ballona Creek will be studied later by a team comprised of the County and City of Los Angeles, a mechanism should be in place to include it later as an SEA.

#### Inclusion of Mandeville and Hoag Canyons in the Santa Monica Mountains SEA

The Conservancy recommends that the Santa Monica Mountains SEA be expanded to the east to include the eastern ridge of Mandeville Canyon through Upper Kenter Canyon to the 405 Freeway and east of the 405 Freeway to Hoag Canyon. This would provide for greater protection for the corridor used by wildlife to travel from the 405 Freeway to Griffith Park. In addition, both canyons contain core habitat values. Hoag Canyon contains the best example of sycamore and oak woodlands in the Santa Monica Mountains east of Topanga Canyon.

#### Additions to the Santa Susana Mountains/Simi Hills SEA

The Conservancy recommends adding to the proposed Santa Susana Mountains/Simi Hills SEA an area encompassing Browns Canyon and part of Mormon Canyon (see Enclosure).

Browns and Mormon Canyons are biologically critical components of the eastern Santa Susana Mountains ecosystem. With the exception of adjacent Devil Canyon, all other drainages on the southern-face of the Santa Susana Mountains within Los Angeles County are developed along their full lengths. Together, the Browns and Devil Canyon watersheds form the most ecologically rich block of habitat in this portion of the mountain range.

We concur with Don Mullally (see February 10, 2001, comment letter) that the wildlife corridors at Fremont Pass and Newhall Pass, located north of the intersection of the 14 and 5 Freeways, and connecting the San Gabriel Mountains to the Santa Susana Mountains, should be added to one of the SEAs (e.g., Santa Susana/Simi Hills SEA). This triangle of land between the San Gabriel Mountains and the Santa Susana Mountains is essential to maintain connectivity between the ranges. Over 75% of the undeveloped land in this triangle is of SEA quality with high quality oak woodland and big-cone douglas fir. We also concur with Mr. Mullally that the discussion of plant communities for the Santa Susana Mountains should be more extensive, including such plant communities as big-cone douglas fir associations, walnut woodlands, and native grasslands.

The Conservancy recommends that portions of the Pico Canyon watershed, as shown on the Enclosure, be included in this SEA. Much of this land is adjacent to extensive public ownership and is part of the core habitat area comprising the adjacent SEA.

#### Expansion of San Gabriel Canyon SEA to include Altadena and La Crescenta Foothills

The Conservancy recommends that the proposed San Gabriel Canyon SEA be expanded westward to encompass the foothills of Altadena and Crescenta Valley to Tujunga Canyon. This proposed expansion encompasses pristine chaparral, oak woodland, and riparian canyon bottoms. For example, Lower Millard Canyon in the Altadena foothills contains dense riparian woodland and heritage oak trees on upland shelves. These woodlands support a rich variety of warblers and other locally rare birds, reptiles, and amphibians. Animal species are able to move to different elevations in these canyons in response to seasonal changes and longer-term conditions such as drought.

These foothills of the San Gabriel Mountains provide for essential east-west wildlife habitat linkages between the north-south trending canyons. The SEA boundary must be moved westward to provide a complete east-west linkage system. An adequate lower elevation habitat linkage system is not contained in the higher elevation Angeles National Forest.

Concurrence with WCCA

The Conservancy concurs with the Wildlife Corridor Conservation Authority's recommendations adopted by their Governing Board regarding the proposed Puente Hills SEA in their May 2001 letter to the County.

Use Watershed Approach on Santa Clara River SEA

California Native Plant Society (CNPS) has recommended utilizing a watershed approach to define the SEAs. This approach should be considered by the County, particularly for the proposed Santa Clara River SEA. The Santa Clara River watershed including the river proper, surrounding upland areas, and tributaries have been documented to support numerous listed and otherwise sensitive species (PCR *et al.* 2000b). These species depend on substantial portions of undisturbed watershed. For this reason, the SEA must include additional drainages and slopes surrounding the Santa Clara River proper.

The Conservancy has previously commented to the County in reference to the Newhall Ranch Specific Plan and Draft Environmental Impact Report that a specific area be must be preserved (letter dated February 11, 1997). This includes a continuous habitat connection and natural land-trail corridor linking the existing Santa Clara River SEA No. 23 and the northern tip of the existing Santa Susana Mountains SEA No. 20. This also includes a prominent ridgeline, that defines the northern boundary of the existing SEA 20, separating the East Fork of Salt Canyon from the principal Potrero Canyon development area. It appears that the proposed Santa Clara River SEA contains this area, but it is difficult to determine this based on the maps provided. We request that this be verified by the County.

Inclusion of a Baldwin Hills SEA

The Land Capability/Suitability Study SEA Report (England and Nelson 1976), lists Baldwin Hills as SEA No. 38, but does not appear to be addressed in the SEA Update Study. The County and the Conservancy are members of the Baldwin Hills Regional Conservation Authority formed to coordinate open space preservation actions in the Baldwin Hills. A new state agency, the Baldwin Hills Conservancy, was established in January of this year. The Baldwin Hills supports a reasonably extensive example of coastal sage scrub left in the Los Angeles Basin. Coastal sage scrub is a California Department of Fish and Game sensitive rare natural community that has been reduced in range significantly and the Baldwin Hills would likely meet the criteria for an SEA.

### Support for Implementation of Land Use Management Practices Guidelines

Comprehensive Land Use Management Practices are recommended for all projects within SEAs, along with specific management practices for each proposed SEA (PCR *et al.* 2000a). These general and specific guidelines include limiting the percentage of disturbance in the SEAs to no more than 20 percent, providing buffers for rare plant communities such as riparian forests, and limiting the density of development in the SEAs. The Conservancy agrees that land use management guidelines such as those proposed in the SEA documents, or ones which provide even more protection, must be implemented to preserve the integrity of the SEAs.

We also support CNPS's recommendation that additional ordinances be considered. These ordinances should be explored further and could include the Land Use Management Practices Guidelines in the subject document and CNPS's specific recommendations. In particular, they should include: requiring wildlife-friendly fencing in linkages or corridors, preserving habitat, requiring publicly-held conservation easements on ungraded land, as well as limiting impermeable surface area.

### Expansion of Selection Criteria to Include Other Sensitive Species

Although the revised draft of selection criteria has already been distributed for review (p. 9; PCR *et al.* 2000a), please consider the following comment. Criterion A is limited to "the habitat of core populations of endangered or threatened plant or animal species," and does not include rare, candidate or proposed species. It would be logical to focus planning and resources on protecting core populations of rare species, in addition to threatened and endangered species, in order to reduce the likelihood of these species becoming listed in the future. The Conservancy also recommends adding "species previously thought be extinct" to this criterion. In the rare and fortunate event that a species that was previously thought to be extinct is rediscovered, that species would merit maximum protection, including designating the area which it inhabits as an SEA.

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April 30, 2001  
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Thank you for the opportunity to comment on this document. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,



MICHAEL BERGER  
Chairperson

Enclosures (3)

Literature cited

England and Nelson Environmental Consultants. 1976. Land Capability/Suitability Study Los Angeles County General Plan Revision Program Significant Ecological Areas Report. Prepared for Los Angeles County Department of Regional Planning and Environmental Systems Research Institute.

PCR Services Corporation (PCR), Frank Havore & Associates, and FORMA Systems. 2000a. Los Angeles County Significant Ecological Area Update Study 2000 Background Report. Prepared for Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. Executive Summary of the Proposed Los Angeles County Significant Ecological Areas. Prepared for Los Angeles County Department of Regional Planning. November.

**SANTA MONICA MOUNTAINS CONSERVANCY**

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December 23, 2002

County of Los Angeles  
Department of Regional Planning  
Attn: Mark Herwick,  
320 West Temple Street  
Los Angeles, California 90012

**Comments on Notice of Preparation for Comprehensive Update and Amendment  
to the Los Angeles County General Plan**

Dear Mr. Herwick:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Notice of Preparation (NOP) and Initial Study (IS) for Comprehensive Update and Amendment to the Los Angeles County General Plan (Project No. 02-305). The majority of the comments in this letter focus on the Significant Ecological Area (SEA) boundaries proposed in the document. (Because no additional information was provided in the NOP regarding management practices for these SEAs, we do not provide additional comments at this time regarding these.) This letter reiterates many of the comments provided by the Conservancy to Los Angeles County (County) on the Los Angeles County Significant Ecological Area Update Study 2000 documents (PCR *et al.* 2000a, 2000b) in a letter dated April 30, 2001 (enclosed).

The General Plan update effort includes the following (IS, pp. 1-2):

- Revisions to growth policies by updating population and housing projections for a new plan horizon year of 2025;
- Revisions to SEA boundaries and related policies, standards, and procedures;
- Technical conversion of land use policy maps to a digital format and realignment of boundaries to reflect assessor parcel boundaries;
- Revisions to transportation policy maps and highway plan;
- Revisions to Conservation and Open Space Element to reflect major changes in laws and current planning practices related to watershed planning and abatement of pollution from storm water runoff; and
- Revisions to boundaries of area and community plans to reflect recent city incorporations.

**Full Support for Specific SEA expansions and Some General Plan Objectives**

The Conservancy continues to commend the County and the consultant team on the excellent work done for the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The County and consultant team have made great strides in this effort and are moving in the right direction. The Conservancy continues to support the proposal to expand several existing SEAs, and to create the proposed Santa Monica Mountains, San Andreas Rim Zone, Antelope Valley, Santa Clara, and the East San Gabriel Valley SEAs. We support the additional expansion of the proposed SEAs since the SEA Update Study 2000, including a portion of the San Andreas Rift Zone SEA (in the northwest part of the County), and an area in the Castaic area near the Santa Clara River SEA (contiguous and south of the Angeles National Forest, bordered on the west by the Ventura-Los Angeles County line, and on the east by Interstate-5 [I-5]). (Please note that we look forward to providing additional comments when maps with a better scale are provided for public comments.)

The Conservancy also supports several project objectives identified in the IS, including “[p]reserve critical lands, including....strategic open lands” (IS, p. 3), and

“[p]rotect the National Forests and Santa Monica Mountains National Recreation Area for their significant natural communities, wildlife corridors, water recharge areas, and recreational opportunities...” (IS, p. 4).

**Maximum Inclusion of SEAs in Incorporated Areas**

The Conservancy’s April 30, 2001 letter recommends that the County analyze areas of existing SEAs in within City jurisdictions in the geographic limits of the County because some cities recognize the importance of SEAs in their General Plans, Zoning Ordinances, and special protective guidelines. To this end, the Conservancy supports the inclusion of the Verdugo Mountains and Tujunga Valley/Hansen Dam existing SEAs, as well as Griffith Park SEA, in the proposed SEAs (as shown on Figure 4 of the IS). These SEAs were not included in the SEA Update Study 2000. The Conservancy continues to recommend that because Ballona Creek will be studied later by a team comprised of County and City of Los Angeles appointees, a mechanism should be in place to include it later as an SEA.

**Additions to the Santa Susana Mountains/Simi Hills SEA**

The Conservancy appreciates the County’s efforts to partially incorporate the recommendations from the Conservancy’s April 30, 2001 letter to expand the Santa Susana

Mountains/Simi Hills SEA proposed in the November 2000 Update Study to include two additional areas (identified as Area A and Area B in our April 30, 2001 letter), and portions of the triangle of land north of the State Route (SR) 14 and I-5 intersection. However, we offer four main comments to fine-tune the boundaries of this SEA.

First, Santa Susana Mountains/Simi Hills SEA should be expanded to incorporate all of our proposed Area A (see April 30, 2001 letter), effectively including Browns and Mormon Canyon. Browns and Mormon Canyons are biologically critical components of the eastern Santa Susana Mountains ecosystem. Although the exact location of the proposed SEA boundary in this area is difficult to determine based on the scale of Figure 4, it appears that only part, or only the west side, of Mormon Canyon is proposed to be included in this SEA. All but a short section of Mormon Canyon is undeveloped, contributing to the ecological value of this canyon. Mormon Canyon is part of the Santa Susana Mountains ecosystem, and there appears to be no justification why half of the canyon would be cut out of this SEA. The entire canyon, including both sides of the canyon, and appropriate buffer (as shown in our proposed Area A) must be included in this SEA.

Second, Santa Susana Mountains/Simi Hills SEA should be expanded to incorporate all of our proposed Area B (see April 30, 2001 letter). The SEA should include all of the undeveloped area south of Pico Canyon, to the Old Road, up to the SEA boundary proposed in the IS. This area is ecologically important due to the presence of core wildlife habitat and high quality oak woodlands.

Third, we recommend that Santa Susana Mountains/Simi Hills SEA (or the expanded adjacent Santa Clara River SEA) be further expanded to include a critical area of the triangular habitat area north of the intersection of the north of the SR 14 and I-5 intersection (see Area C on the enclosed figures). This area is identified as a "Missing Linkage"<sup>1</sup> and preservation of the biological function of this area is essential to maintain connectivity between San Gabriel Mountains and Santa Susana Mountains. This triangle of land also contains high quality oak woodland and big-cone douglas fir.

Fourth, Santa Susana Mountains/Simi Hills SEA boundary should reflect a connection between existing SEA 64 (west of, and adjacent to I5, including the Westridge Open Space), and the remainder of the Santa Susana Mountains/Simi Hills proposed SEA (see Area D on

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<sup>1</sup>"Missing Linkages: Restoring Connectivity to the California Landscape." Conference held on November 2, 2000, San Diego, California. Proceedings written and compiled by Kristeen Penrod, South Coast Wildlands Project.

the enclosed figures). These areas are currently ecologically connected, and there appears to be no biological justification to representing them as isolated areas. (In the November 2000 Update Study, the SEA boundaries reflected these areas as connected.) The Conservancy prefers to depict the connection partially through the existing private open space on the developed Stevenson Ranch property, and partially through the Stevenson Ranch Phase V property (not yet built).

#### **Deletion of Pico Canyon Road from the Master Plan of Highways**

The Conservancy and its Joint Powers Authority, the Mountains Recreation and Conservation Authority (MRCA), cooperatively own and manage the 4,000-acre Santa Clarita Woodlands Park. Pico Canyon Road terminates within the northern portion of this park at the historic oil town of Mentryville. The ultimate alignment and width of Pico Canyon Road will be the principal determinant of whether the canyon's remaining scenic qualities are preserved.

The Conservancy recommends that Pico Canyon Road be deleted from the County's Master Plan of Highways. This recommendation is consistent with the Newhall Ranch Specific Plan Environmental Impact Report (EIR), which recommended deleting Pico Canyon south of the Specific Plan Area from the County's Master Plan of Highways. In addition, the NOP for the Stevenson Ranch Phase V project anticipates Pico Canyon Road to be a two-lane road with only minor contributions to any future project circulation needs. The owners of Stevenson Ranch Phase V property and the Southern Oaks project (Tract No. 43896) are not in favor of any further extension of Pico Canyon Road at highway design standards. This well-defined lack of future need to build Pico Canyon Road at highway standards, in combination with the regionally significant scenic, recreational, hydrological, and ecological resources of the concerned portion of Pico Canyon, dictates the protection of these public resources. Pico Canyon Road should be downgraded from a highway to a collector street on the County's Master Plan of Highways.

#### **Need for Policies to Protect Wildlife and Wildlife Movement With Respect to Roadways and Development**

The General Plan should discuss the issue of compatibility of roadways with wildlife in the Circulation Element and the Conservation and Open Space Element. Some impacts to wildlife from roadways include impeding wildlife movement and increasing road kill. Policies to avoid, minimize, and mitigate impacts to wildlife during continued operation of existing roadways and construction of new and expanded roadways should be included in the General Plan.

The General Plan must show in detail where potential habitat linkages remain to connect large regional open space areas. They should receive a special wildlife corridor designation. The General Plan would be deficient without recognizing these connections.

Specifically the General Plan should address wildlife movement across SR-14, in the stretch of SR-14 between Santa Clarita and Palmdale, in light of any proposed infrastructure improvements or development projects along SR-14. This area has been identified as a "Missing Linkage"<sup>1</sup> because it affords the potential habitat connection between the two portions of the Angeles National Forest, or between the San Gabriel Mountains and the Sierra Pelona Range.

The above-described potential habitat connection across SR-14 connects to another potential habitat connection across I-5, also identified as a "Missing Linkage"<sup>1</sup>. The General Plan should address wildlife movement across this area of I-5, north of Castaic to the Los Angeles County/Kern County line. This area provides for a potential habitat connection between the Angeles National Forest and Los Padres National Forest. The General Plan should include the following information for this potential habitat connection along I-5: the extent of open space remaining along this linkage, the presence and condition of existing underpasses, strategic potential locations for new underpasses to maximize wildlife movement, and where existing publicly-owned open space lands could complement those existing and potential new underpasses. This information is necessary to adequately analyze the impacts from any proposed infrastructure improvements or development projects along I-5, which may result from the General Plan guidelines.

### **Scenic Highway Element**

Per p. 15 of the document, the Scenic Highway Element will be rescinded and in its place, a scenic highway element will be added to the Circulation Element. This revision will eliminate most urban routes depicted in the adopted Scenic Highway Element, and will in turn focus on the scenic qualities present in rural routes (IS, p. 15). We look forward to reviewing which of these scenic highway designations will be eliminated.

### **Other Comments from Conservancy's April 30, 2001 Letter**

The Conservancy continues to make the following comments consistent with its April 30, 2001 letter:

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<sup>1</sup>"Missing Linkages: Restoring Connectivity to the California Landscape." Conference held on November 2, 2000, San Diego, California. Proceedings written and compiled by Kristeen Penrod, South Coast Wildlands Project.

- Expand the Santa Monica Mountains SEA to the east to include the eastern ridge of Mandeville Canyon through Upper Kenter Canyon to the 405 Freeway and east of the 405 Freeway to Hoag Canyon;
- Expand the proposed San Gabriel Canyon SEA westward to encompass the foothills of Altadena and Crescenta Valley to Tujunga Canyon, although the Conservancy notes that some small areas were added since the SEA Update Study 2000;
- Support Wildlife Corridor Conservation Authority's comments regarding the Puente Hills SEA;
- Apply a more comprehensive approach to designating the boundaries of the Santa Clara River SEA; and
- Consider including the Baldwin Hills as an SEA.

Thank you for the opportunity to comment on this document. We look forward to reviewing and commenting on the EIR. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,



MICHAEL BERGER  
Chairperson

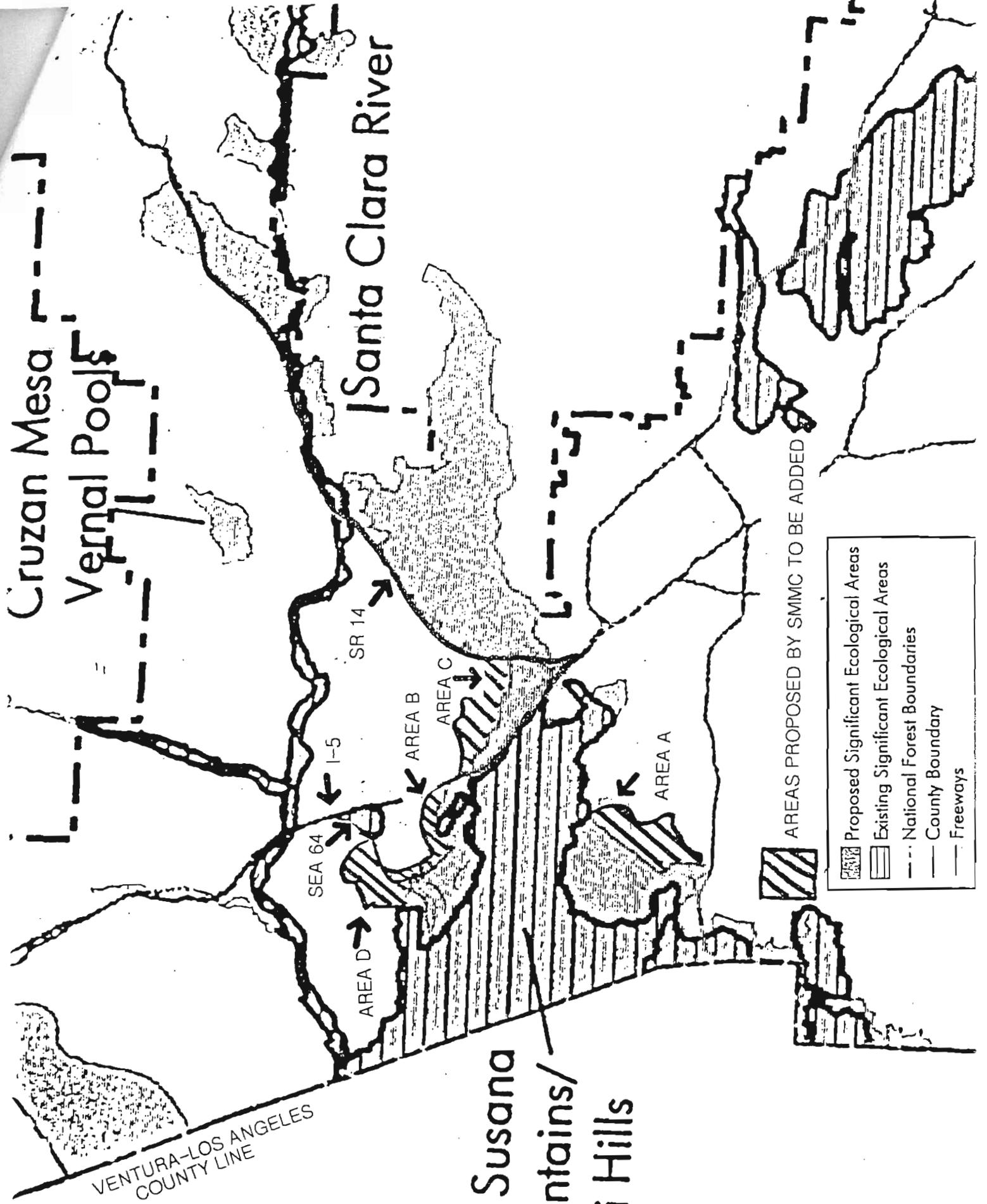
#### Literature cited

PCR Services Corporation (PCR), Frank Havore & Associates, and FORMA Systems. 2000a. Los Angeles County Significant Ecological Area Update Study 2000 Background Report. Prepared for Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. Executive Summary of the Proposed Los Angeles County Significant Ecological Areas. Prepared for Los Angeles County Department of Regional Planning. November.

Cruzan Mesa  
Vernal Pools

Santa Clara River



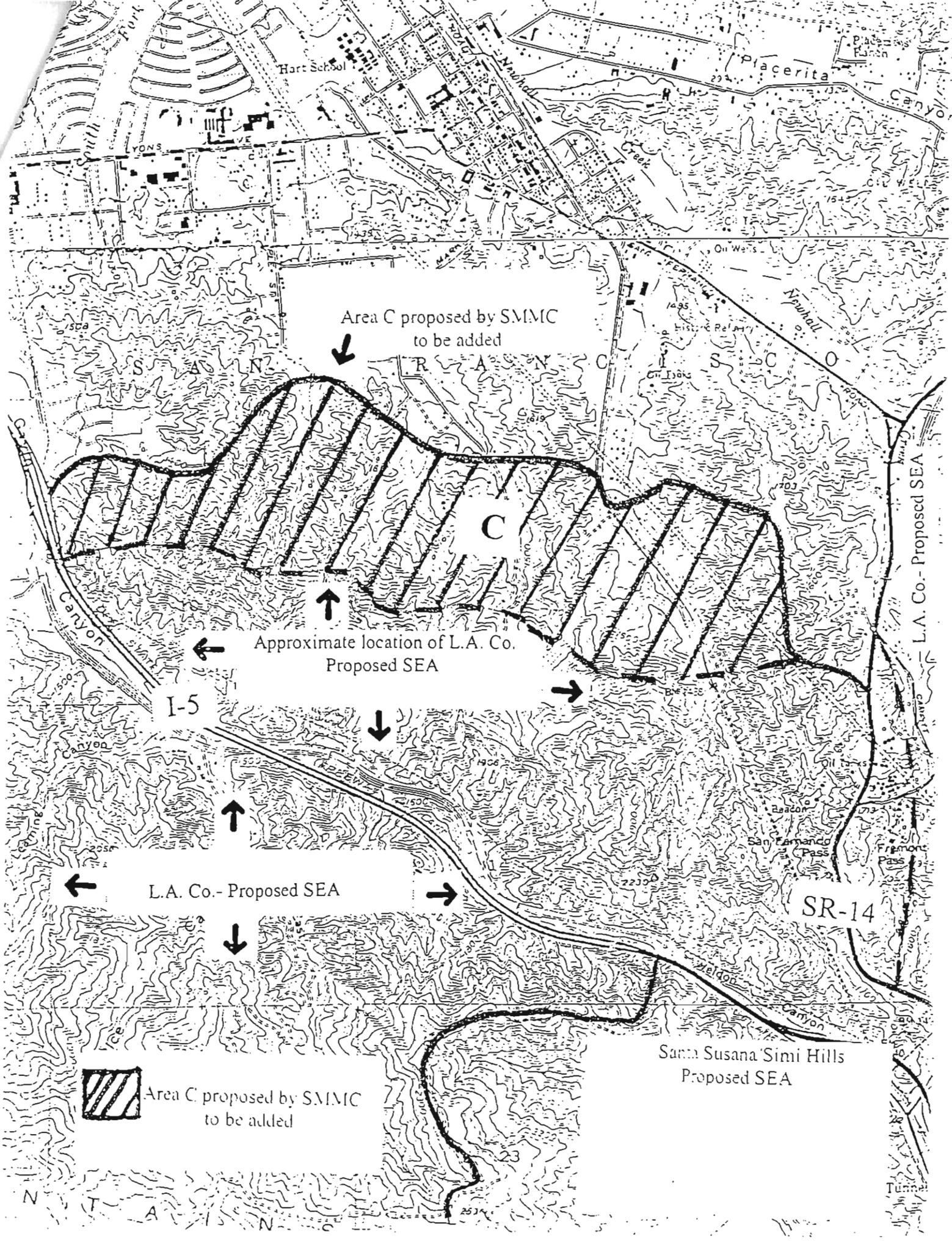
AREAS PROPOSED BY SMMC TO BE ADDED

- Proposed Significant Ecological Areas
- Existing Significant Ecological Areas
- National Forest Boundaries
- County Boundary
- Freeways

anta Susana  
Mountains/  
Simi Hills

unty

VENTURA-LOS ANGELES  
COUNTY LINE



Area C proposed by SMMC  
to be added

Approximate location of L.A. Co.  
Proposed SEA

L.A. Co.- Proposed SEA

 Area C proposed by SMMC  
to be added

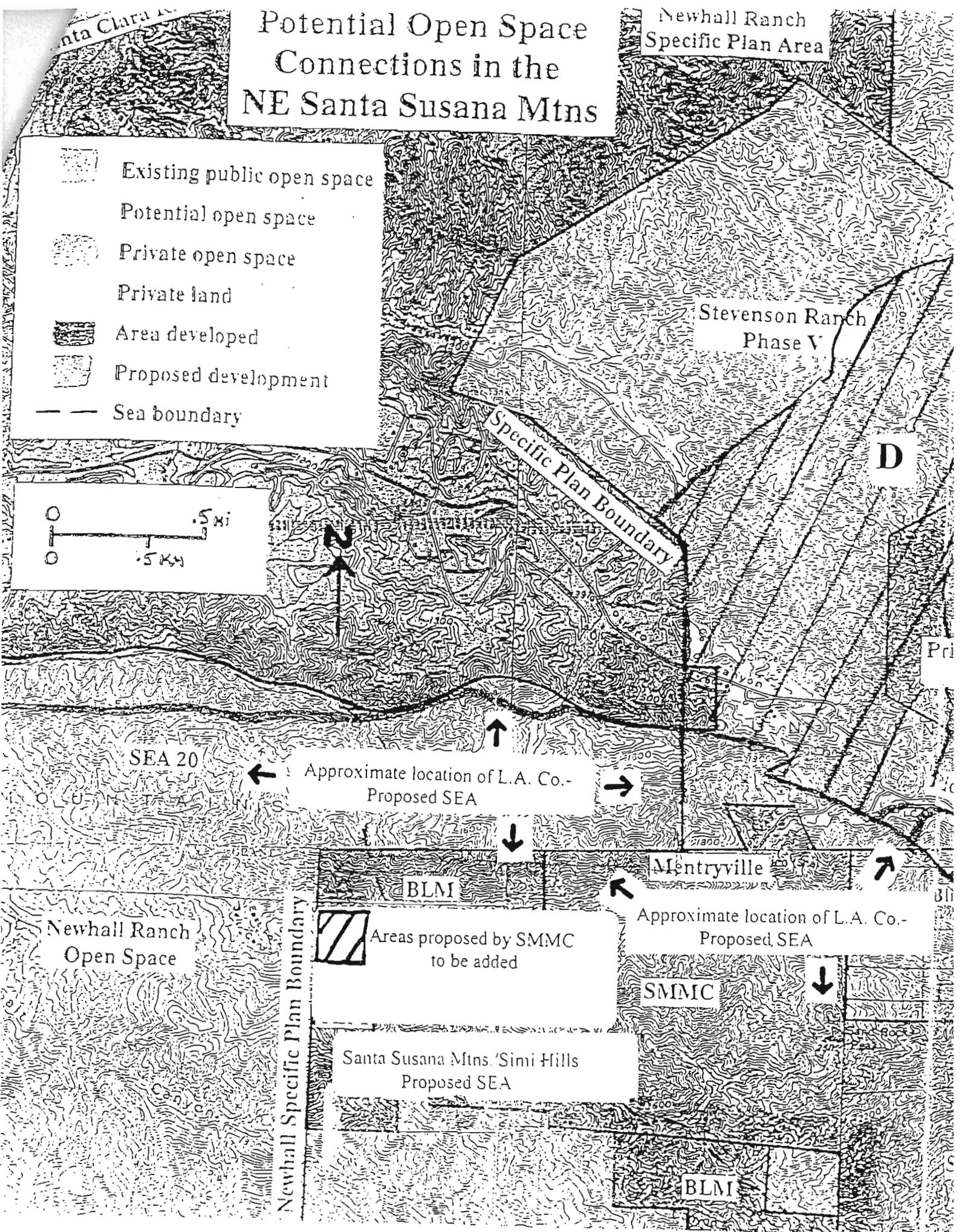
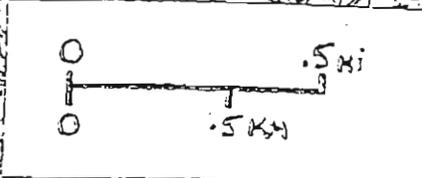
Santa Susana Simi Hills  
Proposed SEA

L.A. Co.- Proposed SEA

# Potential Open Space Connections in the NE Santa Susana Mtns

Newhall Ranch  
Specific Plan Area

-  Existing public open space
-  Potential open space
-  Private open space
-  Private land
-  Area developed
-  Proposed development
-  Sea boundary



Stevenson Ranch  
Phase V

Specific Plan Boundary

D

SEA 20

Approximate location of L.A. Co.-  
Proposed SEA

Mentryville

Approximate location of L.A. Co.-  
Proposed SEA

BLM



Areas proposed by SMMC  
to be added

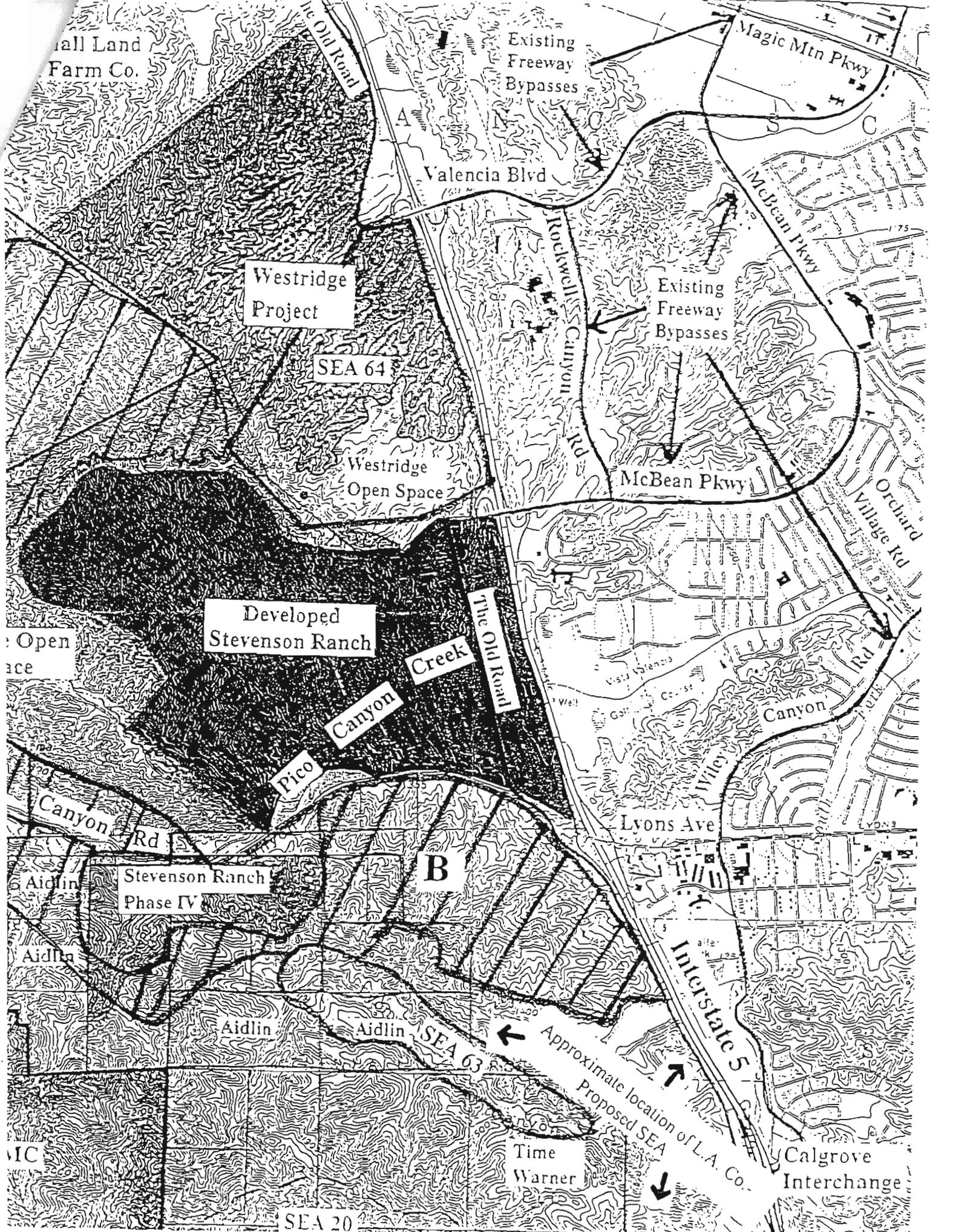
SMMC

Santa Susana Mtns./Simi Hills  
Proposed SEA

BLM

Newhall Ranch  
Open Space

Newhall Specific Plan Boundary



Small Land Farm Co.

Existing Freeway Bypasses

Magic Mtn Pkwy

Valencia Blvd

Westridge Project

SEA 64

Existing Freeway Bypasses

Westridge Open Space

Rockwell Canyon

McBean Pkwy

Developed Stevenson Ranch

Creek Canyon

The Old Road

Pico Canyon

Wilcox Canyon

Lyons Ave

Canyon Rd

Stevenson Ranch Phase IV

B

Aidlin

Aidlin

Aidlin

SEA 63

Approximate location of L.A. Co. Proposed location of SEA

Interstate 5

Time Warner

Calgrove Interchange

SEA 20

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SMMC  
ATTACHMENT 3  
12/02/08  
ITEM 17



June 14, 2004

Mr. James Hartl  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

## OLD SMMC LETTER

### County of Los Angeles General Plan Update

Dear Mr. Hartl:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on Los Angeles County's proposed General Plan Update and related documents, including the Draft Significant Ecological Areas Proposed Regulatory Changes (from the County Department of Regional Planning website). The Conservancy provided related comments in an April 30, 2001 letter to the County on the Significant Ecological Areas Update Study, and in a December 23, 2002 letter to the County on the Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan (enclosed). (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

#### Conservation/Open Space Element

It is critical to add the following policy to the Conservation/Open Space Element (e.g., after Policy O-6.3) to ensure adequate protection of Significant Ecological Areas (SEAS), given the potential for significant adverse environmental impacts from developments in SEAS.

Proposed developments in SEAS shall include mitigation for unavoidable impacts to SEAS from the removal, conversion, or modification of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

Similar to proposed policies O-10.8 and O-12.1, which address recreational opportunities and watershed protection, the following policy should be added after Policy O-5.4 to promote proactive conservation efforts to protect sensitive biological resources:

Pursue and encourage public and/or private funding for the purchase of parcels and/or conservation easements within SEAs to preserve significant ecological resources.

The County is not in the position of advocating development; rather the County responds to and regulates development proposals. Policy O-5.1 should be amended to read: "~~Advocate~~ Restrict development that is ~~highly compatible with~~ compromises biotic resources."

Policy O-5.3 addresses maintaining the integrity of the County's diverse plant communities. Other sensitive and declining plant communities, including coastal sage scrub and native grasslands, should be considered in this policy, in addition to those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game (CDFG).<sup>1</sup> It has been estimated that about 70-90 percent of the presettlement coastal sage scrub in southern California has been destroyed mostly by residential development.<sup>2</sup> Coastal sage scrub also supports a suite of sensitive wildlife and plant species. With respect to native grassland, it has been estimated that there has been about 99 percent loss of native grassland in California.<sup>3</sup>

Policy O-6.3 for SEAs should be amended as follows: "Site roads and utilities to avoid sensitive ~~critical~~ habitat areas or migratory paths." If "critical" habitat is retained, this may appear to limit the analysis to only habitat designated by the United States Fish and Wildlife Service as "critical habitat," when other areas also provide significant habitat values.

The following language should be added to Policy O-6.3 for SEAs, and this policy should also be added to the Circulation Element:

Site roads to avoid significant adverse impacts to wildlife movement.  
Mitigate adverse impacts to wildlife (such as roadkill) during continued

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<sup>1</sup> See sensitivity rankings, "Sensitivity of Top Priority Rare Natural Communities in Southern California," determined by the California Department of Fish and Game.

<sup>2</sup> As cited in Noss et al. 1995

<sup>3</sup> Kreissman 1991, as cited in Noss et al. 1995

operation of existing roadways and construction of new and expanded roadways.

As stated in the Conservancy's December 23, 2002 letter, the General Plan should show where potential habitat linkages remain to connect large regional open space areas, for example, specifically (a) across State Route-14 between Santa Clarita and Palmdale, and (b) across Interstate 5, north of Castaic to the Los Angeles County/Kern County line. The Missing Linkages study (SCWP 2000) addressed numerous habitat linkages, including these two. These areas must receive special wildlife corridor designation in the General Plan.

The Conservancy supports Policy O-10.9 which states in part "[a]dvocate development of... equestrian, biking and hiking trails..." The following policy should be added after Policy O-10.9: "Where feasible and consistent with public safety and operational uses, encourage joint use for public access on infrastructure access roads, and under utility lines."

The Conservancy supports Policy O-8.1, which states:

Protect the visual quality of scenic hillsides, including but not limited to ridgelines, hillside slopes and natural vegetation, to preserve the integrity of existing terrain—particularly areas located at key vantage points from public roads, trails and recreation areas.

### **Significant Ecological Areas Proposed Regulatory Changes**

The comments in this section refer to the draft document from the Los Angeles County website, entitled Significant Ecological Areas Proposed Regulatory Changes, proposed as part of the General Plan Update. The Conservancy notes that the proposed SEA boundaries are substantially larger than those currently adopted. The Conservancy continues to commend the County and the consultant team on the excellent work done for designating the boundaries of the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The Conservancy also appreciates the County's efforts to incorporate some of the Conservancy's previous recommendations regarding SEA boundaries (see the Conservancy's April 30, 2001 and December 23, 2002 letters enclosed).

However, the Conservancy is concerned that the proposed changes to the SEA Regulatory Review Procedures will not provide the needed protections for either the existing or the new expanded SEAs. Notably, additional exemptions to the SEA review process have been added, and many activities would be not be required to be reviewed by Significant

Ecological Areas Technical Advisory Committee (SEATAC), nor would they require a public hearing. The proposed regulations would result in four categories of SEA review: (1) exemptions from SEA review process (no SEATAC review, no public hearing), (2) Director's Review (no SEATAC review, no public hearing), (3) Minor Conditional Use Permit (CUP) (no SEATAC review, sometimes a public hearing is required), and (4) CUP (with SEATAC review and public hearing). (According to the SEAs Proposed Regulatory Changes, these SEA regulatory procedures do not apply to those areas within the Santa Monica Mountains Coastal Zone boundary; those projects are subject to a Coastal Development Permit.)

The Conservancy stresses that a community-level Biological Constraints Analysis must be required for all development projects requiring grading of more than 5,000 sq. ft. within SEAs. This is more consistent with current requirements (as stated in County of Los Angeles Department of Regional Planning Biological Constraints Analysis Guidelines, p. 1, from the County website). This is a key step as part of a proactive approach to adequately protect SEAs. This should be required for all projects grading over 5,000 square feet (sq. ft.) of surface area within SEAs, even those proposed to be exempt from SEA review (see below).

*SEA exemptions (no SEATAC review, no public hearing):* Under the SEAs Proposed Regulatory Changes, some exemptions would include new individual single-family homes, grazing, vegetation removal less than one acre (provided that no more than one acre is removed within a single calendar year), and grading of slopes less than 8 percent (provided that no more than 2,500 cubic yards of earth is moved).

There are uncountable scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts, either individually, or cumulatively, without adequate avoidance, mitigation, or public review. For example, single family homes are being built in the Simi Hills, in or near areas known to support the rare plant, Santa Susana tarplant, without adequate environmental review. There are cases where a new single-family home may be proposed in a visually sensitive area (e.g., visible from scenic roads, trails, parkland, etc.), resulting in significant adverse project-related impacts, or resulting in significant, adverse cumulative impacts from several single-family homes being built in the area. Also, extensive grazing over a large area, can result in significant degradation to native plant communities and sensitive species. Vegetation removal of one acre per year over several years, can also result in significant loss of native habitat and watershed protection. These types of activities can be particularly problematic if the development and vegetation removal occur in sensitive habitat areas near water sources used by wildlife (such as mammals), or near a habitat linkage chokepoint. The proposed new regulations would let such projects through like a super coarse sieve.

These procedures also state that projects on parcels located partially within an SEA (provided the development area is outside of the SEA) are exempt. It appears this may allow fuel modification and other harmful indirect effects on the SEA without consideration of simple avoidance alternatives that would be obvious from a constraints report.

The SEAs Proposed Regulatory Changes document states that several of these activities are not subject to a building or grading permit, thus are not under the scrutiny of zoning review. The Conservancy recommends that the County require SEATAC review for these activities. However, if the County proceeds with considering these activities exempt, then at the very least, the following changes should be made to the SEA exemption procedure. As stated above, a biological constraints analysis should be prepared for all of these aforementioned activities resulting in grading of over 5,000 sq. ft. of surface area within SEAs. The proposed exemptions should be modified as follows:

- New single-family residences, that will result in less than 5,000 square feet of surface area grading....
- Projects on parcels partially within a SEA, provided the development area (including the fuel modification areas) is outside of the SEA, the applicant proposes and commits to implement measures to minimize indirect effects to the SEA, and the County biologist has approved these measures.
- Grazing of horses...provided that the grazing and corrals occupy less than ½ acre.
- Vegetation removal less than one ½ acre total, provided that no more than one acre is removed within a single calendar year (in all years combined on a single property)...
- Grading of land with a slope of less than 8 percent provided that no more than ~~2,500~~ 1,000 cubic yards of earth is moved.

The Conservancy recommends that at the very least the County biologist review these projects to ensure compliance with the exemption requirements.

*SEA Director's Review (no SEATAC review, no public hearing):* According to the SEAs Proposed Regulatory Changes, a "Director's review" would consist of a site visit by the County biologist, review of a checklist, and the possibility for recommended changes by the biologist, and/or recommendation to the Minor CUP process (which also does not require SEATAC review). These types of activities would have greater impacts than those proposed

under the exemption category, and they have the potential for significant, adverse environmental impacts, individually and cumulatively. The Conservancy recommends that these activities listed in this paragraph be subject to SEATAC review and that the public be afforded the opportunity to comment. If the County elects to maintain these activities in this SEA Director's Review category (with no SEATAC review and no public hearing), at the very least, the following changes should be made:

- Grading of land with a slope of less than 8 percent and over ~~2,500~~ 1,000 cubic yards but less than ~~5,000~~ 2,500 cubic yards of earth of moved.
- Vegetation removal of ~~1.0 to 2.5~~ ½ to 1.0 acre...

Also, on the checklist for those projects in the SEA Director's Review category, all streams, not just United States Geological Survey (USGS) blue-line streams, should be considered.

*Minor CUP (no SEATAC review, sometimes a public hearing is required):* The Minor CUP process would require certain Development Standards Applicable to Small Subdivisions and a Burden of Proof to be met, with no SEATAC review required. The Conservancy *strongly* recommends that all small subdivisions (4 units or less) within SEAs be required to be subject to SEATAC review, and that the public be afforded the opportunity to comment. The other activities proposed in this category should also be subject to SEATAC review, including relocation of two or more property lines between three or more contiguous parcels; grading under certain conditions, and vegetation removal under certain conditions. However, if the County proceeds with considering these activities under the proposed Minor CUP process, at the very least, the following changes should be made to the thresholds for this category, to the Development Standards Applicable to Small Subdivisions, and to the Burden of Proof.

If the County elects to maintain these activities in this category, the following changes should be made to the thresholds for this category:

- Grading of land with a slope of 8 percent or greater, but less than ~~25~~ 15 percent in an amount between ~~5,000~~ 2,500 cubic yards and ~~10,000~~ 5,000 cubic yards.
- Vegetation removal greater than ~~2.5~~ 1 acres but less than 20 percent of gross project area, or vegetation removal greater than 1 acre, but less than 2.5 acres....

Additional specificity is warranted for the phrases: "...maintain the remaining portions of the site in a natural undisturbed site..." (in l.a. Development Standards Applicable to Small

Subdivisions, p.8), and "...setting aside appropriate and sufficient undisturbed areas..." (in 2.a. Burden of Proof, p. 9). The following language should be added to these two sections:

This shall be accomplished by dedicating the land in fee simple to an appropriate public entity capable of managing open space for resource protection and recreational use, or by granting conservation easements, or recording a offer to dedicate conservation easements, to the County and to an appropriate public entity capable of managing open space for resource protection and recreational use, prior to vegetation removal or grading.

In 1.c. Development Standards Applicable to Small Subdivisions, the language appears to allow development of a majority of the floodplain or stream, as long as a small portion is not altered. This language should be clarified so as to emphasize avoidance of the majority of the floodplain or stream. From a financial investment standpoint, it seems illogical to build in the floodplain. Also, avoidance of streams is preferred to protect the biological functions and values of the stream. This language should be changed as follows:

Not alter, grade, fill or build within the ~~entire extent of the~~ hydrological floodplain or biological margins of a river corridor, a blue line stream, or other perennial or intermittent watercourse to reduce the need for bank stabilization, unless no other alternative is feasible, the floodplain and watercourse have been avoided to the maximum extent, and appropriate mitigation measures will be implemented.

The proposed 100 foot buffer around wetland areas is not sufficient (1.d. Development Standards Applicable to Small Subdivisions, p. 8) to protect functions and values of the wetland. A buffer of 200-300 feet is more appropriate given the sensitivity of wetlands and the typical buffer recommended by the California Department of Fish and Game.

*CUP (with SEATAC review and public hearing):* The SEA Regulatory Review Procedures for CUPS (including SEATAC review), should provide the highest level of protection because presumably these activities could potentially result in the greatest impacts to the SEAs. Key protections should be added to Section 2. Burden of Proof (p. 11). Additional specificity regarding land dedications and conservation easements should be added to the language in Section 2.a., "...setting aside appropriate and sufficient undisturbed areas..." The language regarding land dedications and conservation easements proposed on page 7 of this letter for the Burden of Proof for Minor CUPS should be added to the requirements for CUPS. Language from Development Standards Applicable to Small Subdivisions relating

to providing wildlife-permeable fencing (i.e., f., p. 9) should be added to the requirements for CUPs. A requirement should be added to the Burden of Proof for CUPs (Section 2.a.) so that access roads are designed to minimize disturbance and avoid and minimize impacts to sensitive resources. Also, “...protect habitat linkages and protect movement corridors” should be added to end of Section 2.e., Burden of Proof for CUPs, regarding preserving habitat connectivity. In addition, buffers of 200-300 feet to wetlands and streams should be a requirement in Section 2.d. Burden of Proof for CUPs.

*Other SEA Considerations:* The Conservancy supports the Specific Considerations for Individual SEAs (Section III., pp. 13-18 of SEAs Proposed Regulatory Changes). These include retaining connectivity and linkage values between the Santa Monica Mountains and Simi Hills, and maintaining linkages between large canyons of the Santa Monica Mountains SEA (p.17), limiting new development to outside the existing floodplain margins for the Santa Clara River SEA (p. 16), and retaining connectivity and habitat linkage values throughout the Santa Susana Mountains and Simi Hills for the Santa Susana Mountains/Simi Hills SEA (p. 18).

### **Land Use Element**

The Conservancy supports the intent of Policy L-2.2 and Policy L-3.1. Notwithstanding, the Conservancy supports the recommendation by San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy to make the following wording changes in these policies:

Policy L-2.2: Promote designs that preserve ~~significant~~ plant and animal habitats, natural scenery—including hillsides and ridgelines—cultural sites, public parklands and open space.

Policy L-3.1: ~~Promote~~ Establish improved inter-jurisdictional coordination of land use and transportation policy matters between the county, cities, adjacent counties, special districts, and regional and subregional agencies.

The following policy should be added to the Land Use Element after Policy L.2-11:

Require that it be demonstrated in development applications that developments are consistent with existing adopted plans including trails plans, parks plans, watershed plans, and river master plans.

### **Housing Element**

The Conservancy supports Policy H-5.8.A, which states in part: "Santa Monica Mountains: Limit housing due to the widespread presence of natural hazards, valuable natural resources..."

### **Circulation Element**

The Conservancy supports Goal C-6, and associated policies. This goal is a scenic highway system that preserves and enhances natural resources within its corridors while serving the public through various transportation modes and access to recreational opportunities.

Goal C-1 should be amended to read:

A balanced, multi-modal transportation system, coordinated with established and projected land use patterns, to serve the mobility needs of residents and commerce and , improve air and water quality, and protect natural resources.

The following policy should be added to the Circulation Element, after Policy C-1.6:

Site roads and utilities to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as roadkill) during continued operation of existing roadways and construction of new and expanded roadways.

The Conservancy acknowledges that the County has deleted a large portion of the extension of Pico Canyon Road from the proposed Highway Plan, compared to the existing Highway Plan, consistent with the recommendation made in the Conservancy's December 23, 2002 letter (enclosed). The Conservancy strongly recommends that this road not be extended on any County Highway Plans, or other plans.

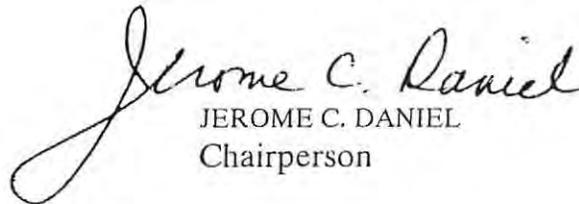
### **Safety Element**

Policy S-3.2 should be expanded to emphasize avoidance of fuel modification practices within public parklands. The following underlined language should be added:

Promote fuel modification practices that balance safety with natural habitat protection and that help reduce the risk of damaging runoff and erosion. For developments adjacent to parklands, site and design developments to allow required fire-preventative brush clearance to be located outside park boundaries unless no alternative feasible building site exists on the project site and the project applicant agrees to pay for required fuel modification within the parkland. Maintain a natural vegetation buffer of sufficient size between the necessary fuel modification area and public parkland.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Judi Tamasi of our staff at (310) 589-3200 ext. 121 and at the above Ramirez Canyon Park address.

Sincerely,



JEROME C. DANIEL  
Chairperson

#### Literature cited

Kreissman, B. 1991. California, an environmental atlas and guide. Bear Klaw Press, Davis, Calif.

Noss, R.F., E.T. LaRoe III, and J.M. Scott. 1995. Endangered Ecosystems of the United States: A Preliminary Assessment of Loss and Degradation. U.S. Department of the Interior, National Biological Service, Biological Report 28. February.

South Coast Wildlands Project (SCWP). 2000. Missing Linkages: Restoring Connectivity to the California Landscape-Proceedings. San Diego Zoo, San Diego. November 2.

**SANTA MONICA MOUNTAINS CONSERVANCY**

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SMMC  
ATTACHMENT 2  
12/02/08  
ITEM 17



August 27, 2007

Bruce W. McClendon  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1309  
Los Angeles, California 90012

## OLD SMMC LETTER

### **Comments on County of Los Angeles Draft Preliminary General Plan Update and Significant Ecological Areas**

Dear Mr. McClendon:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on Los Angeles County's proposed General Plan Update and related documents. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

#### **Conservation/Open Space, Parks and Recreation Resources**

The Conservancy agrees with the proposed County Policy C/OS 1.2:

Create an established network of open space areas that provide regional connectivity, such as areas between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to the Puente-Chino Hills..

#### **Biological Resources**

It is critical to amend the following policy to the Conservation/Open Space Element Policy C/OS 5.1 in order to secure adequate protection of Significant Ecological areas (SEAs), given the potential for significant adverse environmental impacts from development in SEAs.

Maintain and monitor the program and network of Significant Ecological Areas (SEAs). Proposed developments in SEAs shall include mitigation for unavoidable impacts to SEAs from the removal, conversion, or modification

of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

The following policy should be added after Policy C/OS 5.1 to promote, monitor and ensure efforts to protect wildlife corridors.

Site roads to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as road kill) during continued operation of existing roadways and construction of new and expanded roadways.

The General Plan should show where potential habitat linkages remain to connect large regional open space areas, for example, specifically (a) across State Route-14 between Santa Clarita and Palmdale, and (b) across Interstate-5, north of Castaic to the Los Angeles County/Kern County line. The Missing Linkages study (SCWP 2000) addressed numerous habitat linkages, including the two aforementioned. These areas must receive special wildlife corridor designation in the County General Plan Update.

Policy C/OS 5.3 addresses maintaining the integrity of the County's diverse plant communities. Other sensitive and declining plant communities, including coastal sage and native grasslands, should be considered in this policy, in addition of those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game (CDFG).<sup>1</sup> It has been estimated that about 70-90 percent of the pre-settlement coastal sage scrub in Southern California has been destroyed primarily by residential development.<sup>2</sup> Coastal sage scrub also supports a suite of sensitive wildlife and plant species. With respect to native grasslands, it has been estimated that there has been about 99 percent loss of native grassland in California.<sup>3</sup> Valley needlegrass grassland is recognized as very threatened by CDFG. The County should revise the statement C/OS 5.3

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<sup>1</sup> See sensitivity rankings "Sensitivity of Top Priority Rare Natural Communities in Southern California," determined by the California Department of Fish and Game.

<sup>2</sup>As cited in Noss et al.

<sup>3</sup>Kreissman 1991, as cited Noss et al.

County of Los Angeles  
General Plan Update  
August 27, 2007  
Page 3

as follows :

“Maximize the ecological function of the County’s diverse natural habitats, such as Joshua Trees, native Oak woodlands, Coastal sage scrub, Valley and needlegrass grasslands, and other perennial grasslands.”

#### **SEA Project Review – Minor Conditional Use Permit for SEA (Minor SEA-CUP)**

Under Biological Resources in Chapter 3 of the Open Space/Conservation Chapter in the General Plan, some exemptions would include new individual homes or desires an accessory to their single-family home within an SEA, a simple site plan review is only needed to verify that zoning standards are observed. This is an administrative procedure that the County deems unnecessary for the Minor SEA-CUP review.

There are numerous scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts, either individually or cumulatively, without adequate avoidance, mitigation, or public review. These procedures also state that if the project(s) on parcels located partially within an SEA, (provided the development area is outside of the SEA), the activity is exempt. Such a sweeping provision would not work with lots 2-acres or larger because both non-structural and future development can result in significant, ecological adverse impacts. For this reason, the proposed single family exemption from a CUP leaves a significant gap in protection. Any acreage above and beyond 2-acres should either be permanently protected with an irrevocable deed restriction or a conservation easement to a public park agency. Such deed restriction or conservation easement must prohibit all future development, including agriculture, non-native plants, equestrian facilities and non-fire department required brush clearance.

#### **SEA-CUP with Significant Ecological Area Technical Advisory Committee (SEATAC) Review**

The SEA Regulatory Review Procedures for CUPS (including SEATAC review) should provide the highest level of protection because realistically, large scale subdivision projects could potentially result in the greatest impacts to the SEAs. The following statement should be amended to:

“Recommendations ~~may~~ will include the clustering of structures away from sensitive areas, and then dedicating the area as natural open space to a public park agency. Other recommendations may include limiting lighting, protection of habitat linkages and movement corridors, providing wildlife-

permeable fencing, and maintaining a short distance between existing infrastructure regulating new development to limit grading of natural vegetation.”

### **Scenic Resources**

Upon review, the Conservancy recommends that the following statement to be amended as follows in Figure 5.6:

Preserve ~~significant~~ sensitive trees and habitats, natural watercourses, wildlife corridors and distinctive natural features.

Los Angeles' landscape is filled with hillside, scenic resources. It is essential to recognize the need to preserve important significant viewsheds found within the County. The Conservancy strongly recommends that the grading percentage qualification should be reduced from 25% to 15% under the Hillside Management Ordinance and the Hillside Management CUP. Topography and natural biological resources enable the residents of Los Angeles County to enjoy all the scenic resources, including the hillsides.

### **Soledad Canyon, Angeles Connector**

The Angeles Connector, also known as the Soledad Canyon Conceptual Area Protection Plan (CAPP), is a critical wildlife movement zone. The Connector is a critical biological pathway linking the two portions of the Angeles National Forest. Though it may not qualify as a SEA, the Conservancy strongly recommends that the CAPP area be included as a wildlife movement area in the County General Plan and all open space and SEA maps. Portions of the CAPP have been included alongside the Santa Clara River SEA (SEA 25), and a copy of the CAPP boundaries is attached.

### **Significant Ecological Areas**

The comments in this section refer to the draft documents and maps from the Los Angeles County Department of Regional Planning Website entitled “Significant Ecological Areas”, proposed as part of the General Plan Update. The Conservancy notes that the proposed SEAs are noticeably larger than those that are currently adopted within the County. The Conservancy continues to commend the County and the consultant team on the excellent work done for designating the boundaries of the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The Conservancy appreciates the

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County's efforts on incorporating some of the Conservancy's prior recommendations regarding SEA boundaries.

**SEA 27, Santa Susana Mountains and Simi Hills**

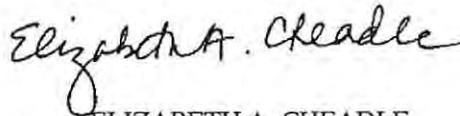
The Significant Ecological Area of the Santa Susana Mountains and Simi Hills should be expanded to include the following vital biological resources. A key part of supporting the SEA are the Big Cone Fir trees between Interstate-5 (I-5) and California State Route-14 (SR-14) in the southern boundary of the City of Santa Clarita and unincorporated Los Angeles County. The proposed boundary of SEA 27 at the junction I-5 and SR-14 lies just south of protecting a critical wildlife movement corridor that connects the Santa Susana Mountains from the west to the San Gabriel Mountains to the east. The wildlife corridor pathway is wedged between the two highways and crosses through the unique Big Cone Fir trees. The Conservancy strongly recommends that SEA 27 boundary be extended northward to encompass much more of the Big Cone Fir trees.

**SEA 25, Santa Clara River**

The Santa Clara River is a long, delicate Significant Ecological Area. The SEA boundaries near Agua Dulce Canyon and south of SR-14, should be extended east towards Escondido Canyon where there is an existing wildlife corridor leading to SR-14 lies just east of the Agua Dulce Canyon boundary found in SEA 25.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at the above Ramirez Canyon Park address provided above.

Sincerely,



ELIZABETH A. CHEADLE  
Chairperson

**SANTA MONICA MOUNTAINS CONSERVANCY**

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December 23, 2008

Mr. Mark Herwick  
County of Los Angeles  
Department of Regional Planning  
General Plan Development Section  
320 West Temple Street  
Los Angeles, California 90012

**Comments on Los Angeles County Draft General Plan:  
Planning Tomorrow's Great Places 2008**

Dear Mr. Herwick:

Santa Monica Mountains Conservancy (Conservancy) staff offers the following comments on Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008. We understand that the County is currently preparing the Draft Environmental Impact Report for the Plan. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

### **Open Space Dedications**

Conservancy staff concurs with many of the goals, policies, and implementation actions in the Conservation and Open Space element such as Policy C/OS 2.1, "Develop and expand regional and local parkland in the County," and Implementation Action C/OS 1.1, "Coordinate with Local, State, and Federal park agencies and conservancies to acquire open space for recreation and biotic preservation throughout the County." However, implementation actions should be added at the beginning of the plan's life to encourage or require open space dedications as part of the development process. For example, Implementation Action C/OS 2.2 could be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require permanent open space dedications and protection as part of the development process to mitigate adverse environmental impacts. Open space dedications must be offered to open space park agencies or another entity acceptable to the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

In addition, under the Design Guidelines for Significant Ecological Areas (SEAs; p. 135), we recommend adding the following underlined language:

2. At a minimum, Retain a contiguous area of undisturbed open space over the most sensitive natural resources to maintain regional connectivity within the undeveloped area, and preserve this area in perpetuity through a recorded fee simple dedication to an open space park agency prior to the issuance of any permits.

We strongly support Policy C/OS 5.7, and we recommend the following underlined language be added:

Require that development mitigate “in-kind” for unavoidable impacts to biologically sensitive areas and permanently preserve mitigation sites, via recorded fee simple dedications or permanent deed restrictions prior to the issuance of any permits.

To acknowledge the role that public conservation agencies have in the acceptance of open space dedications, the following underlined text should be added (p. 124, Section II. Open Space, Parks, and Recreation):

For the purposes of the General Plan, open space dedications are defined as privately owned lands that have been set aside for permanent open space space, or dedicated in fee simple or protected in some other manner by a conservation agency, as part of a larger land development proposal. Commitment of such lands to open space use in perpetuity is typically assured through deed restrictions or dedication of construction rights secured ~~at the time of~~ concurrent with, but not later than, development permit approval, or by protection by a conservation agency.

It is critical when County planners are reviewing development proposals, that they are aware of the locations of not only publicly-owned parks and open space, but also privately-owned land protected by conservation easements or deed restrictions. This is an important tool when planning the locations of developments and where future open space should be set aside. It is preferable that contiguous blocks of open space be protected, rather than ending up with disjointed patches. The following implementation action should be added:

Implementation Action C/OS 2.3. Within six months of approval of the General Plan by the County, create, and update periodically, a GIS layer of protected open space owned by Federal, State, County, or other local agencies or non-profits to assist staff in the project review process and aid applicants in their project design. As the following information becomes available, the layer must include other protected lands, such as conservation easements and permanent open space deed restrictions

### Trail Dedications

Conservancy staff supports many of the trail measures in the General Plan, including Policy C/OS 4.1, "Expand multi-purpose trail networks for all users." As with open space dedications, we suggest that implementation actions be added to encourage or require trail dedications as part of the development process. Implementation Action C/OS 4.2 could be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require trail easement dedications as part of the development process to mitigate adverse recreational impacts. Trail easement dedications must be offered to open space park agencies or another entity acceptable to the County. Guidelines should clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

We support Implementation Action C/OS 4.1, as a GIS layer of proposed trails is a valuable tool for County planners to have when reviewing development applications. Knowing the locations of nearby existing trail easements is also highly valuable in order to successfully site a trail easement on a particular property so that it connects to any trail easements on adjacent properties, or so that it will eventually connect to easements on nearby properties. We recommend that the following underlined language be added:

Within six months of approval of the General Plan by the County, create, and update periodically, a GIS layer of proposed federal, state, county and adjacent city trailways and trailway segments, and existing and proposed trail easements and offers to dedicate trail easements, to assist staff in the project review process and aid applicants in their project design. Field verification should be conducted to determine the legitimacy of trail locations.

### SEAs and Biological Protections

We support the County's identification of the linkages, from the South Coast Wildlands Missing Linkages project, on Figure 6.3, Proposed SEAs map. However, depicting the linkages as simple lines is misleading and grossly inadequate. The General Plan must include a figure replicating the precise boundaries of the least cost unions, and potential crossing structures, for the linkages. There is no better science than this study to define the linkages. This work was done at the parcel level (although that parcel data was not publicly released) and the County may wish to obtain the parcel level data from South Coast Wildlands.

We also compliment the County on the inclusion of several important policies to protect SEAs. However, we do recommend some modifications such as adding the following underlined text to Policy C/OS 5.6:

Require that developments within an SEA be designed to meet the Significant Ecological Area Technical Advisory Committee recommendations, to the greatest extent possible, even it that means some substantive diminution of the property's economic value, and to...Preserve wildlife movement corridors; Site roads to avoid sensitive habitat areas or migratory paths;...Provide open or permeable fencing.

Conservancy staff supports the Design Guidelines for a Model Subdivision Project in an SEA (p. 135) to locate development away from wildlife corridors... (5), avoid impermeable fencing outside the development... (6), and direct outdoor lighting downward, away from adjacent open space areas (7). We recommend adding the following design guideline: "Site and design roads to avoid significant adverse impacts to wildlife movement." We recommend that all of these design guidelines apply to any development, not just subdivisions within an SEA.

In general, we strongly support the more inclusive SEA boundaries as proposed in the Draft General Plan and we commend the County on applying this approach. At the scale of the SEA map online, we are unable to definitively provide more specific comments. According to County staff, maps at a better scale, that can be overlain on other layers such as aeriels, will be provided online by the County in December. We look forward to reviewing those maps online, or other maps with staff, and providing more specific comments on the SEA boundaries at that time.

We continue to strongly recommend against making all single-family homes in SEAs exempt from Significant Ecological Area Technical Advisory Committee review (see the Conservancy's June 14, 2004 letter). Single family estates with vineyards, accessory structures, and other uses can often be much more damaging than a cluster of three moderate-sized homes. The exemption should be amended to state:

Individual single-family residences that will result in less than 5,000 square feet of surface area grading, where only one residence is proposed to be built on a legal lot or parcel of land, including project-related grading impacts.

Per the General Plan, additional information on the regulatory provisions of SEAs is included in the Technical Appendix; per the website the technical appendices will come later. We would appreciate the opportunity to comment on that technical appendix when it becomes available.

We strongly support the Implementation Action C/OS 5.3 (p. 139), although we recommend modifying the text (see also Schlotterbeck 2003<sup>1</sup>):

~~Consider adding~~ Add a new section to the Initial Study Checklist to create a review procedure for open space connectivity. ~~Habitat~~ Habitat connectivity reviews shall consider the physical linkages on the project site and how it will maintain both local and regional habitat connectivity, ~~particularly with regard to wildlife corridors.~~

We also support Implementation Action C/OS 5.2 (p. 139) to create a formal Mitigation Land Banking Program. However, it is not clear why this would only be mitigation for development in areas outside of SEAs, and why it could not include mitigation for development inside SEAs.

The County's Draft General Plan recognizes the challenges at the urban-wildland interface (p. 138). We recommend that another implementation action be added:

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<sup>1</sup>Schlotterbeck, J. 2003. Preserving Biological Diversity with Wildlife Corridors: Amending the Guidelines to the California Environmental Quality Act. *Ecology Law Quarterly* 30(4).

Implementation Action C/OS 4.6. Create guidelines for developments to minimize edge effects at the urban-wildland interface, which may include options for specific actions to manage pets, restrict lighting in open space, create compatible landscaping, etc.

Because of the cumulative impacts to native habitat from the conversion to vineyards, we recommend that the General Plan include the following policy (in Section IV. Agricultural Resources): “Policy C/OS 6.9. In remaining native habitat open space areas, discourage the extensive conversion of sensitive native habitat to agricultural land.”

### **Scenic Resources**

We support the Scenic Resources measures including Policy C/OS 11.1, to “Identify and protect scenic resources,” and Implementation Action C/OS 11.1, “Create a scenic corridor and scenic viewshed program and/or ordinance to protect the County’s remaining scenic resources.”

We recommend that a portion of State Route 14 be given a scenic designation, from its intersection with Escondido Canyon Road, west to the edge of the unincorporated Los Angeles County boundary. This area is included in the Soledad Canyon-Angeles Linkage Conceptual Area Protection Plan (CAPP). Some properties in the CAPP are actively being acquired for permanent protection, involving multiple partners and using several funding sources, including County funds. This area contains an absolutely unique viewshed and it includes the Pacific Crest Trail.

We look forward to reviewing the Technical Appendix (once it becomes available), which pertains to the selection of scenic resources, scenic corridors, and provides practices for their continued protection and preservation (p. 149).

### **Park Uses**

While the Conservancy, a State agency, is sovereign and not subject to local land use regulation, we have many partner agencies which may be affected by the General Plan. As many parks are located in the Open Space land use designation, it is important that necessary park facilities and operations are allowed in the Open Space land use designation. For example, in many cases, park agencies have acquired open space land and used existing buildings for staff residences or offices. We recommend that the following language be added to the open space land use designation (p. 39), under Open Space Conservation (OS-C), Open Space Parks and Recreation (OS-PR), and Water (OS-W):

“Includes passive recreation (e.g., trails) and open space parks and all associated support facilities/uses customarily found in conjunction therewith.”

If possible, we also recommend that the following specific language be included under these categories:

This includes, but is not limited to: park offices and staff residences, camp stores, parking, restrooms, camping, trails, habitat restoration, signage, park fencing/gates, and temporary uses typically allowed in the State Park system.

Also, park agencies will acquire land in the County in non-Open Space land use designations, such as Rural land use designations. It is important that park agencies can open and operate these parks right away for public use, for example, as required by some funding sources. It would be cumbersome to complete a General Plan amendment immediately to change the land use for every property that is acquired by a park agency in order to open and operate the park. We recommend that the following underlined language be added:

Purpose:...[T]he Rural designations:...Preserve areas of significant natural and scenic resources and allow for passive recreation and open space parks and all the associated support facilities/uses customarily found in conjunction therewith. (p. 27).

Under Intensity of Use (pp. 27-28), the underlined language should be added (and should be added to all Rural Land designations):

Rural Land 1. Rural land uses include single family homes, equestrian uses, agricultural and related activities, ~~and~~ other rural activities at one (1) dwelling unit per acre (1 du/ac) density, and passive recreation and open space parks and all associated support facilities/uses found in conjunction therewith.

Because park agencies may acquire land in other land use designations (other than Open Space or Rural), we recommend a blanket statement in the General Plan in the Conservation and Open Space Element (for example, under Goal C/OS-2, p. 132), such as the following:

Allow property in any land use designation to be used for passive recreation (e.g., trails) or open space parks and all associated support facilities/uses customarily found in conjunction therewith.

We recommend that Policy C/OS 4.2 be expanded to address other important park facilities to accommodate multiuse trail users (e.g., differently-abled individuals):

Promote strategically located staging areas, and trail heads, and other support facilities (e.g., parking, campsites, restrooms) to accommodate multiuse trail users.

Also, because many open space parks are established based on the presence of valuable biological resources, they are by definition likely to be included in the County's proposed SEAs. It is important that the SEA regulations proposed in the General Plan do not impede park uses and facilities. We recommend that language be added to the SEA regulations such as:

Passive recreation and open space park and associated support facilities and uses shall be allowed in SEAs. This includes, but is not limited to camping, parking, restrooms, signage, habitat restoration, park fencing/gates, and other uses typical of the State Parks system.

### Open Space Maps and Categories

It appears that some parks are not included as open space on the Open Space figure (identified as Figure 5.1 and 6.1), or Figure 3.2, Distributions of Land Use for Unincorporated Areas. Some of these parks that were excluded are in the Santa Monica Mountains Coastal Zone. You may contact our GIS Project Manager Marc Shores ([marc.shores@mrca.ca.gov](mailto:marc.shores@mrca.ca.gov)) to obtain the latest GIS layer of the Conservancy's and Mountains Recreation and Conservation Authority's (MRCA's) ownerships.

For the open space designations, a category should include parkland owned by MRCA, a local agency. This might fit under the category: "Other Park and Conservancy Land," (p. 124, and on the Open Space figure) with the following underlined text added: "Private recreation areas, private deed restricted open space, ownership by cities, other local agencies, joint powers authorities, and non-profits, and beaches..." We also recommend adding the Conservancy and MRCA to other park agencies that share the goal of managing open space and natural areas in the County (p. 123). The following underlined text should

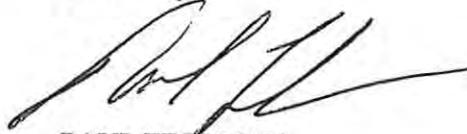
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also be added (p. 123): "Existing open spaces in the County include national forests, state, county, city, and other local parks, and nature preserves." The following underlined text should also be added (p. 130):

Many agencies and individuals own parcels within the 150,000-acre [Santa Monica Mountains National] Recreation Area. There are state, and federally, and locally owned parks, residential neighborhoods, and commercial developments.

Conservancy staff appreciates the opportunity to comment. Please direct any questions or future documents to Judi Tamasi of our staff by phone at (310) 589-3200 ext. 121, by email at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov) and at the above Ramirez Canyon Park address.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Edelman", written in a cursive style.

PAUL EDELMAN  
Deputy Director for  
Natural Resources and Planning

**SANTA MONICA MOUNTAINS CONSERVANCY**

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August 30, 2011

Ms. Connie Chung, AICP  
Supervising Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1356  
Los Angeles, California 90012

Ms. Thuy Hua, AICP  
Senior Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1356  
Los Angeles, California 90012

**Notice of Preparation of a Draft Environmental Impact Report  
Los Angeles County General Plan and Antelope Valley Area Plan Updates**

Dear Mses. Chung and Hua:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed both the Los Angeles County Draft General Plan and the Draft Antelope Valley Area Plan. We appreciate the ongoing working relationship with your staff as you write the policies that will guide growth in Los Angeles County for the next generation.

Please find attached two comment letters for inclusion in the scoping for the Draft Environmental Impact Reports for the respective plans. The most recent letter for the Draft General Plan was sent to your department on June 27, 2011 and included previous letters on the subject as attachments. A new letter dated August 29, 2011 on the Antelope Valley Area Plan update is also attached. The Conservancy had not yet received the Notice of Preparation before drafting this letter. We request that all of these referenced materials be included in scoping.

If you have any questions, I can be reached at (310) 589-3200, ext. 128.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Edelman".

PAUL EDELMAN  
Deputy Director  
Natural Resources and Planning

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June 27, 2011

Ms. Julie Lowry, Principal Planner  
General Plan Development Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Supplemental Comments on Los Angeles County Draft 2035 General Plan**

Dear Ms. Lowry:

The Santa Monica Mountains Conservancy (Conservancy) appreciates the opportunity to comment on the Draft 2035 General Plan. In addition to our previous comments, dated May 23, 2011, the Conservancy offers the following comments. It is our hope that the proposed changes contained herein can be made to the draft plan prior to the issuance of the Notice of Preparation such that they are included in the environmental review process.

**Requested Revisions to Significant Ecological Area Boundaries**

Since our May 23, 2011 letter, the Conservancy has identified specific requested additions to the County's proposed Significant Ecological Areas (SEAs). The attached additions are refined versions of previous Conservancy requests. All of these requested additions are substantially similar to and contiguous with the habitat contained within the County's proposed SEAs. The Conservancy sees no justification for exclusion of these habitat areas from SEA designation when they are ecologically interrelated and biologically similar to the County's designations. Each requested addition is discussed in detail below.

**Proposed Newhall Wedge Addition to Santa Susana Mountains/Simi Hills SEA**

The Conservancy requests a northerly expansion of the proposed SEA designation north of the I-5 in the "Newhall Wedge". The requested addition would extend northerly along I-5 to Calgrove Boulevard, then easterly along the edge of current development to Pine Street, as depicted in the attachment. An additional portion would extend easterly from Pine Street along the Eternal Valley Fire Road, then southerly along the ridgeline to the County's proposed SEA boundary. The expansion would include the area between I-5 and The Old Road, which contains a rich California Walnut Woodland community and Mountains Recreation and Conservation Authority (MRCA) parkland.

This expanded area includes two blue line streams home to Southern Coast Live Oak Riparian Forest and known occurrences of California orcutt grass (*Orcuttia californica*), a state- and federal-listed species. Additional rare or threatened species occurrences in the expanded area include slender mariposa lily (*Calochortus clavatus var. gracilis*) and Palmer's grapplinghook (*Harpagonella palmeri*). The California Walnut Woodland in the southwestern portion of the expanded area is part of the known range for western mastiff bat (*Eumops perotis californicus*).<sup>1</sup>

Most importantly, the expanded area forms part of the Newhall Wedge habitat block and facilitates critical regional wildlife movement. Due to existing constrained conditions, the Newhall Wedge habitat block must be of sufficient size to support a viable home range for medium-sized mammals in order to continue its present role in regional connectivity. The expanded area would ensure that existing conditions do not deteriorate further.

The County's proposed SEA is deficient for not including approaches to two freeway undercrossings within the designated area. Both The Old Road and Calgrove Boulevard undercrossings are essential for maintaining regional habitat connectivity—the primary purpose of designating this SEA. The Old Road undercrossing is rated the highest quality of all I-5 crossing points in the Newhall Wedge. The crossing is open, with ample tree cover on both east and west approaches. To effectively protect wildlife movement, the SEA must include all approaches to this undercrossing. Topographical constraints require protection of the entire ridge to ensure access from the north. The woodland area on both sides of The Old Road must likewise be included.

The area's known rare resources and critical importance in regional wildlife connectivity warrant its inclusion in the Santa Susana Mountains/Simi Hills SEA.

### **Proposed Mormon Canyon Addition to Santa Susana Mountains/Simi Hills SEA**

The Conservancy also requests an addition to the Santa Susana Mountains/Simi Hills SEA that includes Mormon Canyon on the southern flank of Oat Mountain. The proposed expansion is ecologically unified with the adjacent Browns Canyon, much of which is protected by the MRCA. Like Browns Canyon most of Mormon Canyon consists of Southern Mixed Riparian Forest, providing a critical water source and cover on an

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<sup>1</sup>Department of Fish and Game. *California Natural Diversity Database*.

otherwise arid south-facing slope. As a tributary of Browns Canyon, any disturbance in the upper Mormon Canyon watershed will affect downstream resources within the County's proposed SEA. The Conservancy used watershed boundaries as the basis for the proposed SEA expansion, which is shown in the attachment.

Mormon Canyon is a critical piece of the Oat Mountain habitat block. The woodland habitat in upper Mormon Canyon is actually superior to Browns Canyon and in closer proximity to California Walnut Woodland and Valley Oak Woodland on the other side of the ridge. The lushness of the vegetation in upper Mormon Canyon suggests the presence of a spring and provides ample cover for southwest-northeast wildlife movement. Due to its ecological similarity with Browns Canyon, a biological survey would likely identify occurrences of the same rare or threatened species, including two-striped garter snake (*Thamnophis hammondi*), coast horned lizard (*Phrynosoma blainvillii*), and Plummer's mariposa lily (*Calochortus plummerae*).

#### **Proposed Valley Oaks Savannah-Santa Susana Mountains/Simi Hills SEA Connection**

The current extent of the proposed Valley Oaks Savannah SEA does not follow the County's own imperatives for SEA selection and design. The County's previous experience shows that small, isolated SEAs do not adequately protect significant resources. As explained in the County's Conservation and Open Space Element Resources, the design of the current 1980 SEAs is deficient due to the creation of habitat "islands" surrounded by soon-to-be-urbanized land:

Because some of the "island" habitats were isolated from each other by development within the intervening areas, the opportunity for species movement and genetic dissemination was dramatically reduced. Therefore, the identification of island habitats, independent of the entire ecosystem, was ultimately deemed to be unsustainable.<sup>2</sup>

Despite this previous experience, the County's proposed Valley Oaks Savannah SEA is precisely that: a habitat "island". To address this deficiency, the Conservancy proposes an expansion of the Santa Susana Mountains/Simi Hills SEA that connects directly with the Valley Oaks Savannah SEA. As shown in the attachment, the requested addition would

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<sup>2</sup>Appendix E: Conservation and Open Space Element Resources. *Draft 2035 General Plan 56*

extend from public parkland in Pico and Potrero Canyons around built-out Stevenson Ranch to reach the Valley Oaks. Without this habitat connection, terrestrial mammals would be unable to access the isolated block. As a result, the Valley Oaks would not support a healthy predator population and the ecosystem would be unsustainable in the long term. Furthermore, adaptation to climate change would be precluded by the genetic barrier and physical constraint on species home range evolution.

### **Requested Amendments to County Highway Plan**

During the One Valley One Vision planning effort in the Santa Clarita Valley, the Conservancy requested specific amendments to the highway plan to reduce impacts to biological resources. Should it be impossible to make these changes through that planning vehicle, the Conservancy requests that the following proposed rural widenings or extensions be removed from the General Plan Mobility Element:

- Agua Dulce Canyon Road
- Davenport Road
- Escondido Canyon Road
- Bouquet Canyon Road north of Copper Hill Drive
- The Old Road south of Calgrove Boulevard
- Placerita Canyon Road
- Shadow Pines Boulevard/Tick Canyon Road (proposed extension)
- Sierra Highway north of Vasquez Canyon Road
- Pico Canyon Road

The Conservancy contends that each of the above projects would have a significant avoidable impact on wildlife movement by increasing wildlife mortality, discouraging crossings, and decreasing genetic exchange. In their comments on the One Valley One Vision Plan, the California Department of Fish and Game independently arrived at the same conclusion.

The science is quite clear in this respect: vehicle collisions are the leading direct human-caused sources of bobcat and mountain lion mortality in Southern California. Wider roads increase mortality and decrease the frequency of successful crossings until a threshold width is reached where crossings are no longer attempted (i.e. across freeways). A study in New

Mexico directly documented these effects on mountain lion populations.<sup>3</sup> Widening roads leads to faster vehicle speeds and larger traffic volumes, both of which are factors in vehicle-wildlife collision rates. Even the width of the pavement has a negative effect on mountain lion dispersal. Local research by the National Parks Service and others have observed frustrated dispersals among tracked carnivores and documented the resulting significant genetic differences across movement barriers.

The Conservancy believes that widening these roads is bad policy. The only possible justification for doubling road capacity within these rural areas is to promote further residential development in remote areas—in direct opposition to the stated goals of the current planning effort. The circulation models appear to assume traffic volume increases only possible if housing continues to sprawl into rural-zoned areas, leading to the misguided recommendation to increase capacity. Even worse, the extension of Shadow Pines Boulevard/Tick Canyon Road all the way to Davenport Road would divide a Significant Ecological Area and provide access to otherwise remote parcels, thereby inducing growth. The County and others are actively promoting protection of these resources through the Angeles Linkage Conceptual Area Protection Plan, so it is unclear why the general plan would then propose fragmenting the same habitat area.

Due to the cumulative nature of the impacts, these issues are best addressed at the plan level. While any one widening could feasibly be mitigated, a succession of mitigated road widenings would still decrease overall landscape-level permeability. The Conservancy therefore requests that these impacts be avoided entirely or comprehensively mitigated at the plan level with appropriate policies and programs, including construction of crossing structures and acquisition of adjacent habitat.

### **Requested Inclusion of Transfer of Development Rights Program**

In discussion with County staff, the Conservancy raised the idea of implementing a countywide Transfer of Development Rights (TDR) program. Such a program would relieve development pressure on sensitive rural areas and facilitate smart growth in urban centers, particularly in connection with transit-oriented developments. It is our understanding that such a program has been included in the Draft 2035 General Plan. The Conservancy is in

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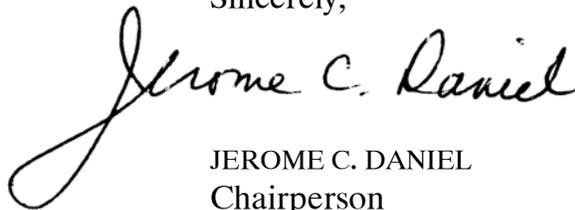
<sup>3</sup>Sweanor, L. L., K. A. Logan, and M. G. Hornocker. 2000. Cougar dispersal patterns, metapopulation dynamics, and conservation. *Conservation Biology* 14:798-808.)

Ms. Julie Lowry, General Plan Development Section  
Supplemental Comments on Los Angeles County Draft 2035 General Plan  
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full support of the proposed TDR program and looks forward to collaborating with County staff on its design and implementation. For your reference, we have attached the outlines of the proposed program as described by County staff. Specifically, we recommend explicitly including the City of Santa Clarita in the General Plan language to facilitate the program's implementation in the northern portion of the County.

Thank you for your consideration of these comments. The Conservancy appreciates the ongoing collaboration with your staff as this process moves forward. We hope that these requested revisions, additions, and deletions can be accomplished prior to commencement of the Draft Environmental Impact Report such that they can be fully vetted during environmental review. If you have any questions, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128.

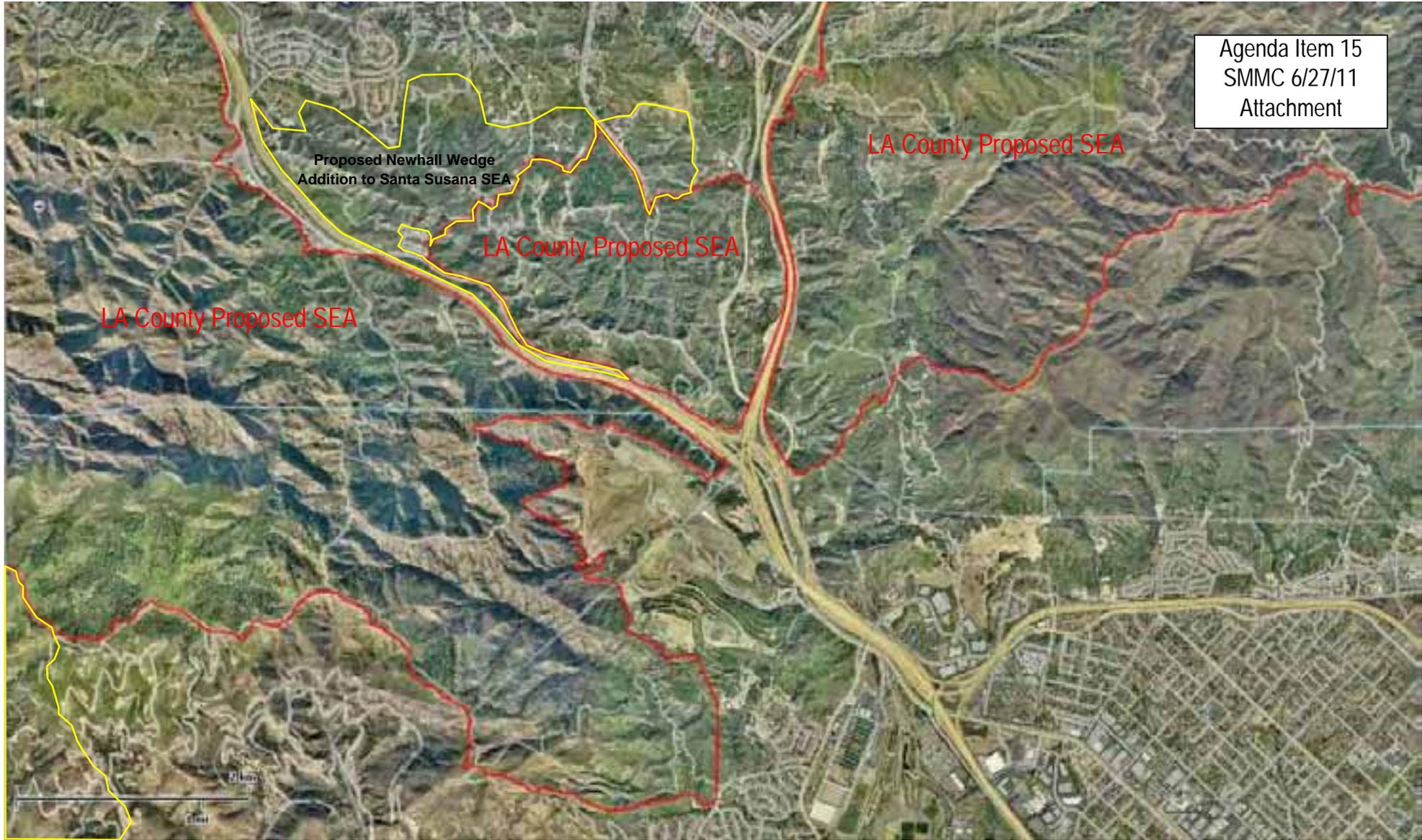
Sincerely,

A handwritten signature in black ink that reads "Jerome C. Daniel". The signature is written in a cursive style with a large, looping initial "J".

JEROME C. DANIEL  
Chairperson

Attachments

Agenda Item 15  
SMMC 6/27/11  
Attachment

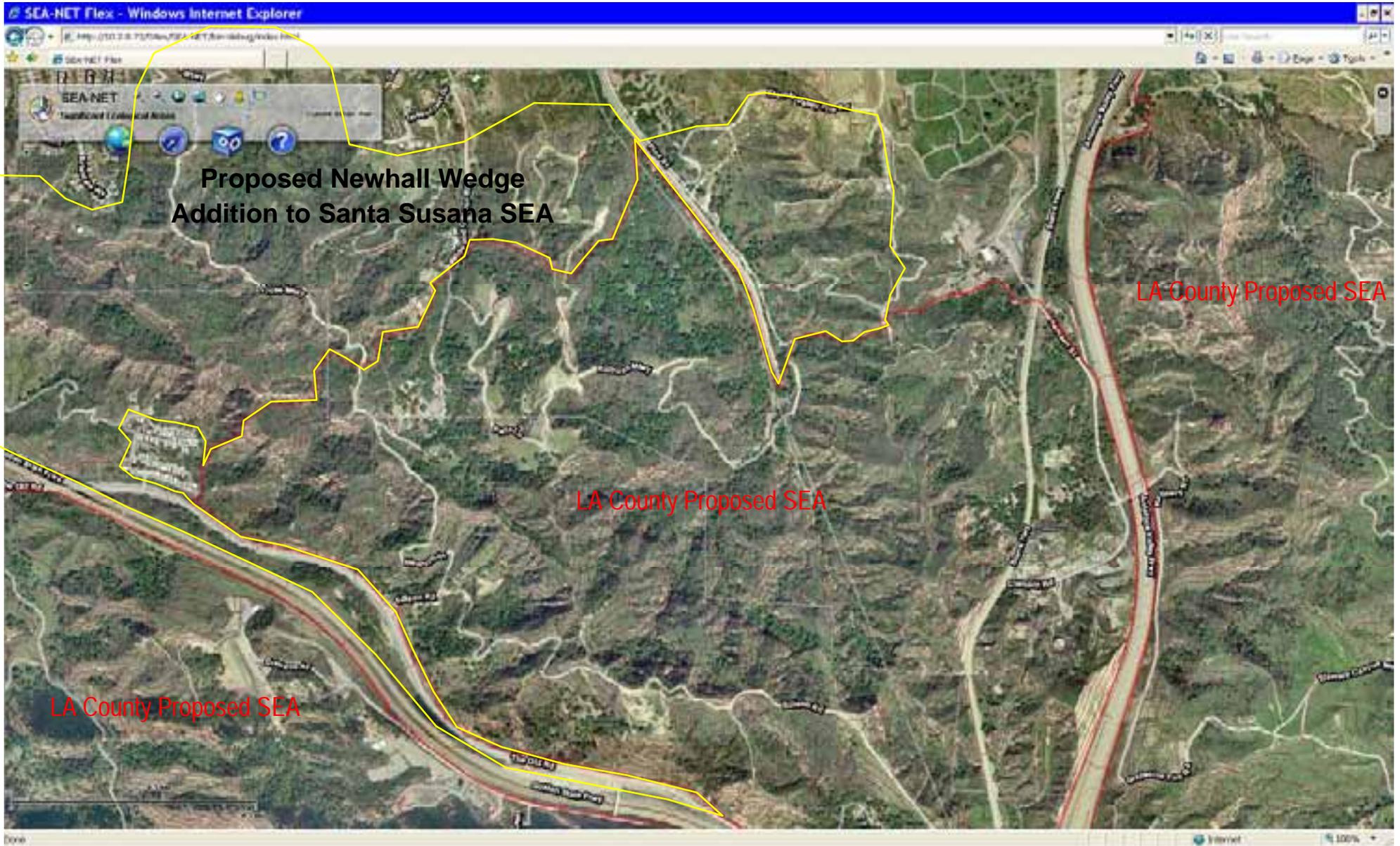


Proposed Newhall Wedge  
Addition to Santa Susana SEA

LA County Proposed SEA

LA County Proposed SEA

LA County Proposed SEA



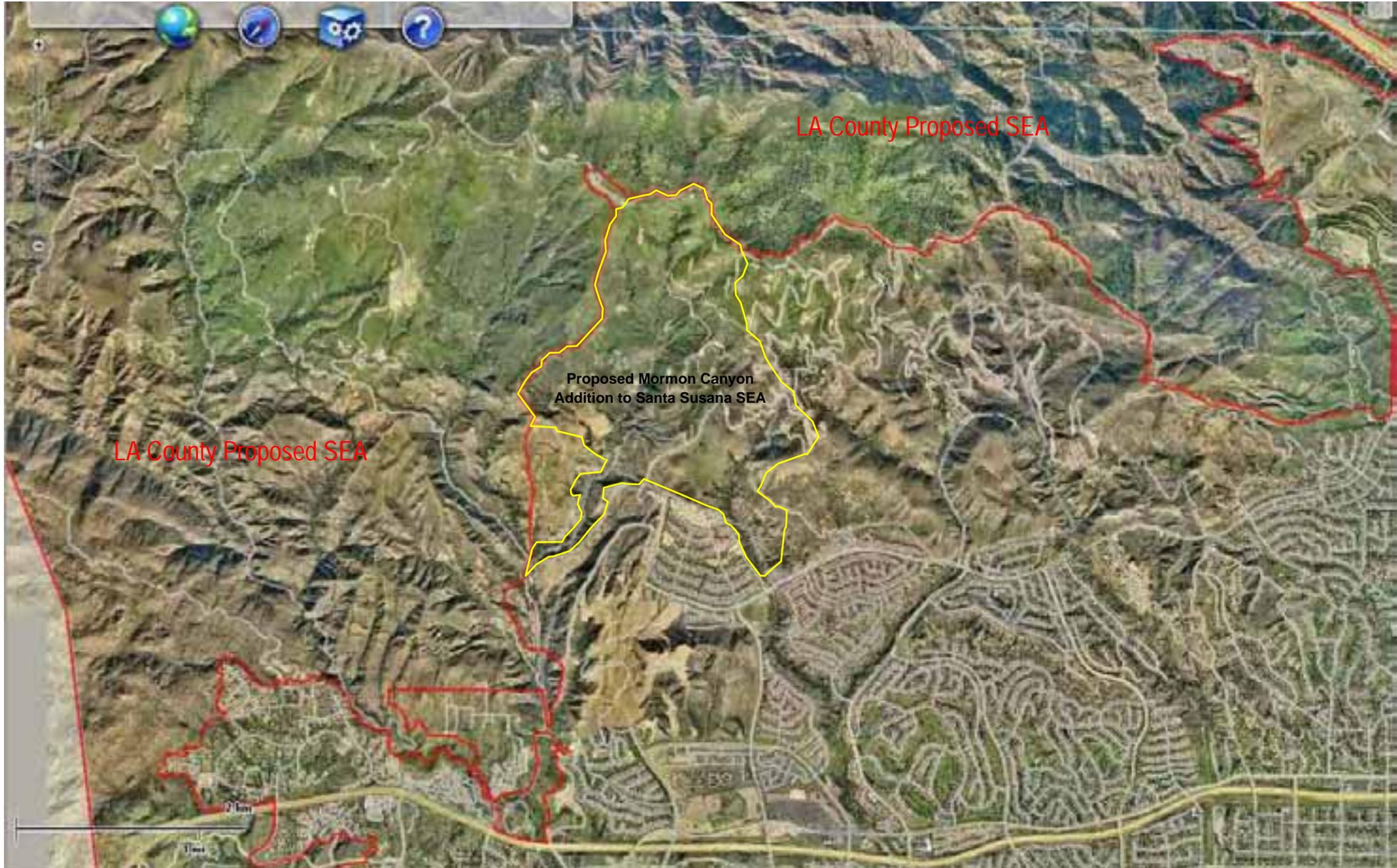
**Proposed Newhall Wedge  
Addition to Santa Susana SEA**

LA County Proposed SEA

LA County Proposed SEA

LA County Proposed SEA

Extend to Calgrove Undercrossing



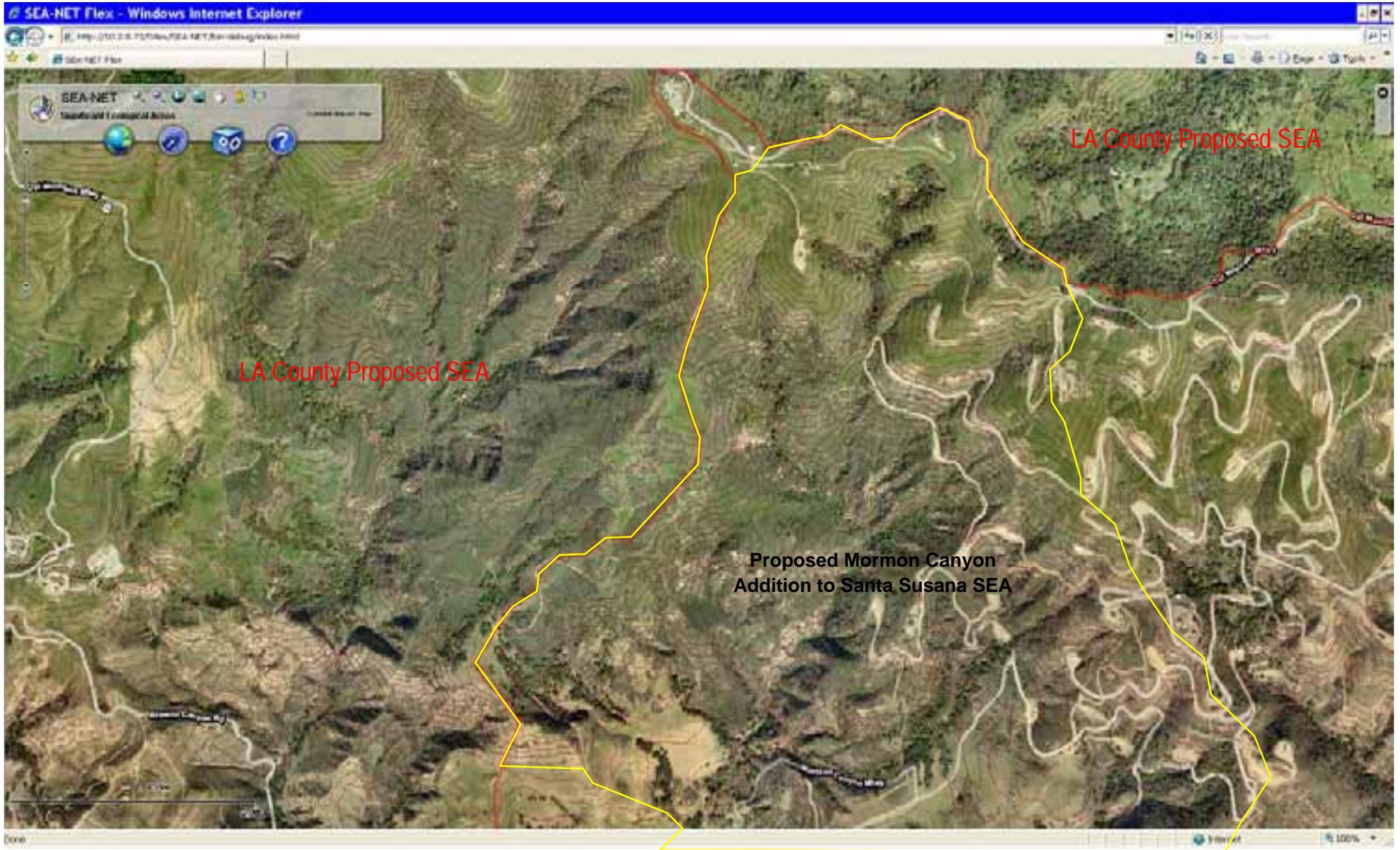
LA County Proposed SEA

Proposed Mormon Canyon  
Addition to Santa Susana SEA

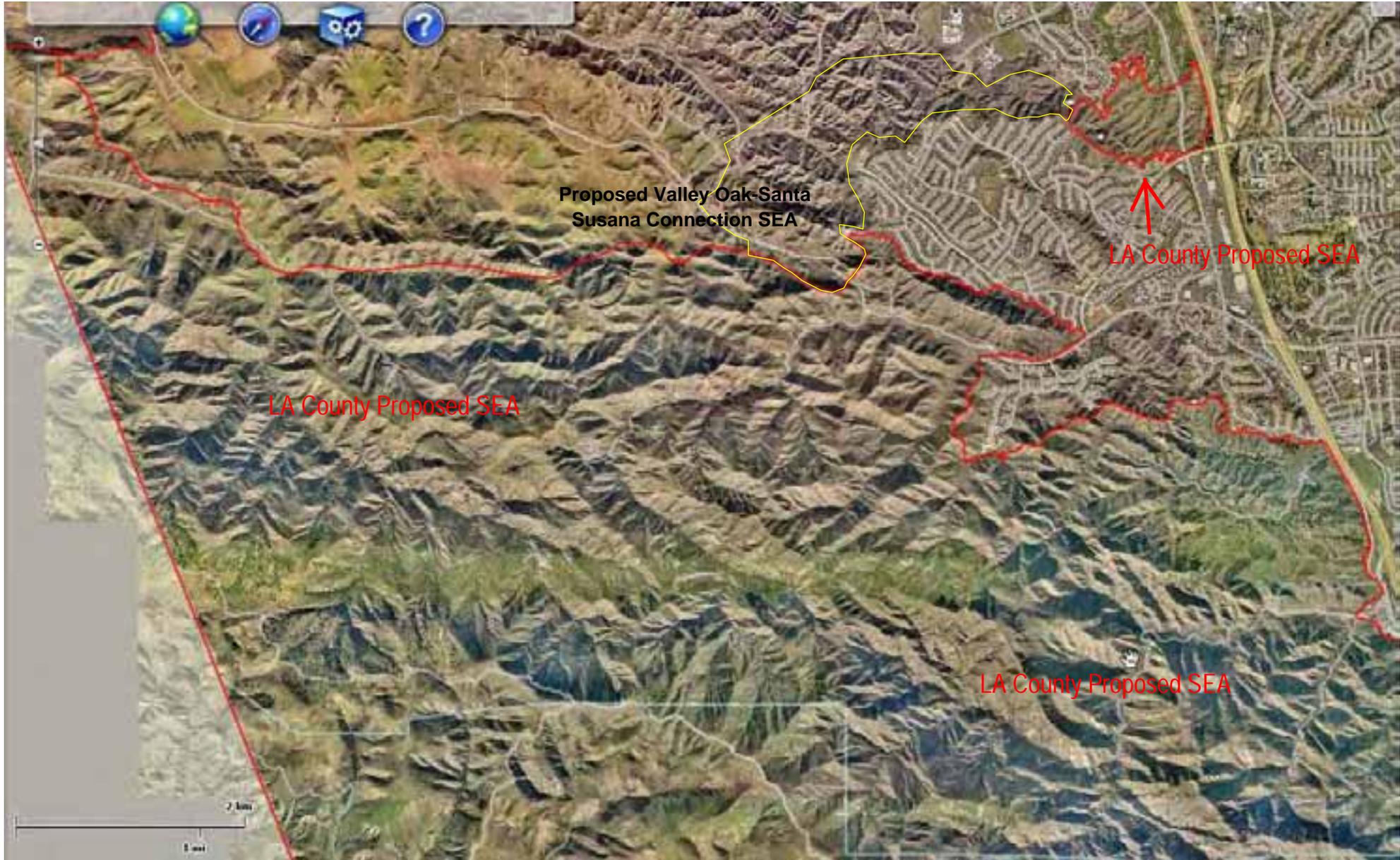
LA County Proposed SEA

2 mi

1 mi







Proposed Valley Oak-Santa  
Susana Connection SEA

LA County Proposed SEA

LA County Proposed SEA

LA County Proposed SEA



**Proposed Valley Oak-Santa  
Susana Connection SEA**

LA County Proposed SEA

LA County Proposed SEA

SEA-NET  
Mapbox

**From:** [Glaser, Mitch](#)  
**To:** [Eric Bruins](#); [Paul Edelman](#)  
**Cc:** [Jason Smisko](#); [Chung, Connie](#)  
**Subject:** TDR Program  
**Date:** Tuesday, June 14, 2011 9:35:02 AM

Agenda Item 15  
 SMMC 6/27/11  
 Attachment

Good Morning Eric and Paul:

On May 17, the Santa Monica Mountains Conservancy (SMMC) sent a letter to the Santa Clarita City Planning Commission regarding the City's General Plan Update. The City's General Plan Update is a component of "One Valley One Vision" (OVOV), which is a joint effort between the City and Los Angeles County. The other component is the County's Santa Clarita Valley Area Plan Update.

The SMMC letter stated, in part, "The Conservancy therefore recommends that the City include an additional policy that directs staff to work with the County to establish an inter-jurisdictional development rights transfer program wherein development rights from all rural-zoned parcels are eligible for transfer to urban-zoned areas, subject to reasonable conditions. Such a program could even provide a bonus for transferring rights from rural parcels within a SEA to leverage the benefits of such a program."

As you may be aware, the County is also in the process of updating its Countywide General Plan. A draft was released in April and may be found at the following Web Site:  
<http://planning.lacounty.gov/generalplan>

The Draft Countywide General Plan Update must undergo an environmental review (EIR) prior to public hearings. A Notice of Preparation for the EIR will be released shortly and we anticipate that the EIR will be released in early 2012. Public hearings before the County's Regional Planning Commission and Board of Supervisors will occur after the EIR is released and we anticipate that the Countywide General Plan Update will be adopted by the end of 2012.

The Draft Countywide General Plan Update includes a Transfer of Development Rights (TDR) implementation program, which I have copied below. The "Phase 2" timeframe means 3-5 years after adoption:

			Timeframe			
Implementation Program	Actions	General Plan Policies	Phase 1	Phase 2	Phase 3	Ongoing
Transfer of Development Rights Program	<ul style="list-style-type: none"> <li>Explore the feasibility of a Transfer of Development Rights (TDR) Program in order to direct growth and development away from valuable open space areas to identified infill areas.</li> </ul>	Land Use Element: Goals LU 3, LU 4		X		

	<ul style="list-style-type: none"> <li>· Identify open space, rural and agricultural areas, including Agricultural Resource Areas (ARA) and Significant Ecological Areas (SEAs), under development pressure as sending areas. Identify potential receiving areas, such as TODs and vacant and underutilized sites, in urban areas</li> <li>· Prepare an ordinance that outlines applicability and procedures for the TDR Program.</li> <li>· Establish County entity to coordinate the sales and transactions of TDR.</li> </ul>					
--	--	--	--	--	--	--

I feel that this TDR implementation program is in line with what the SMMC would like to see in the Santa Clarita Valley.

Given the large number of cities in the County, it would be practically impossible for the County to pursue an inter-jurisdictional TDR program with all of them. However, it is possible for the County to work with the City of Santa Clarita on this program, and it makes sense when you consider that the City is completely surrounded by County territory (unlike any other City in the County) and that the City and County are already committed to joint planning, as evidenced by the OVOV effort.

We could add another bullet point to the description of the program that would indicate that we will work with the City of Santa Clarita. The bullet point would be something to the effect of "Include the City of Santa Clarita in the TDR program in order to continue the joint planning efforts initiated by the One Valley One Vision program." Given the technical and legal challenges, we can't guarantee that we'll ultimately have an inter-jurisdictional program with the City, but this implementation program would commit the City to exploring the feasibility with us and working with us on our ordinance and (potentially) a companion ordinance in the City's Unified Development Code.

I have conferred with Jason Smisko, my counterpart at the City of Santa Clarita, and he indicated that the City is willing to participate in this program. He will acknowledge this during his presentation to the Santa Clarita City Council. I have also conferred with Connie Chung, my colleague who is responsible for the Countywide General Plan Update, and she is also willing to pursue this. I anticipate that the Draft Countywide General Plan Update will be amended accordingly.

I hope that this addition will fulfill SMMC's recommendation. If you have any questions or concerns, please feel free to contact me. As previously discussed, I will set up a meeting with the SMMC in the

near future to discuss the County's Santa Clarita Valley Area Plan Update and SMMC's concerns in that regard. The meeting will also provide an opportunity to discuss the Countywide General Plan Update and the County's Antelope Valley Area Plan Update, which is also in progress and will be adopted concurrently with the Countywide General Plan Update.

Thanks,  
Mitch

Mitch Glaser, AICP  
Supervising Regional Planner  
Community Studies North Section  
Department of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012  
<http://planning.lacounty.gov>  
213-974-6476



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**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV



May 23, 2011

Gretchen Siemers, Planner, AICP  
Housing Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Comments on Los Angeles County Draft 2035 General Plan**

Dear Ms. Siemers:

The Santa Monica Mountains Conservancy (Conservancy) offers the following initial comments on the Draft 2035 General Plan. We anticipate providing additional comments on the Plan later. From 2001 to 2008, the Conservancy has submitted five comment letters on the General Plan, Significant Ecological Areas (SEAs) and SEA Update Study, SEA Proposed Regulatory Changes, and Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Comprehensive Update and Amendment to the Los Angeles County General Plan.

In this current letter, we emphasize several key comments. It is our understanding that an Environmental Impact Report (EIR) will be prepared by the County for the Draft 2035 General Plan. We understand the County will soon release a new NOP for the Draft General Plan. The General Plan and EIR will be deficient if they do not incorporate the following provisions.

**Significant Ecological Area Boundaries**

In previous comment letters, the Conservancy expressed its support for the more inclusive SEA boundaries (compared with current SEA boundaries) and the Conservancy commended the County on applying this approach. We compliment the County's efforts to propose more inclusive and biologically sound boundaries to ensure the long term ecological sustainability of the SEAs.

The Conservancy's letters, as well those of local agencies, have explicitly defined ecologically justified SEA boundary expansions. Those boundary expansion requests are

each accompanied by a rationale supported by at least one basic principle of conservation biology related to SEA ecological sustainability.

To our knowledge the County has not gone on record with opposing arguments rooted in the principles of conservation biology that justify the exclusion of areas recommend for SEA inclusion by the both the Conservancy and other government entities. The onus is at least equally upon the lead agency to justify the exclusion of such recommended inclusion areas as it is for the recommending agencies to provide detailed studies to justify what are plainly visible macro-landscape level spatial relationships shown on Google Earth aerial photographs. Both the General Plan and its EIR will be more evolved and defensible documents if they include rationale for the exclusion of those SEA expansion areas recommended by government agencies with conservation biology staffs. Likewise such rationale is equally applicable to supporting the inclusion of areas within the County staff's proposed SEA boundary expansion areas.

The EIR must include a feasible alternative with larger SEA boundaries for the SEAs identified in the Conservancy's and other government agencies' previous comment letters (for example, see December 23, 2002 Conservancy letter, enclosed).

### **Dedications of Land and Conservation Easements**

The Conservancy concurs with many policies and implementation actions in the General Plan including Policy C/OS 1.3, which states:

Create an established network of open space areas that provide regional connectivity, between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to the Puente Chino Hills.

However, the Draft General Plan is lacking in addressing key issues with respect to open space dedications. As indicated in our December 23, 2008 letter (enclosed), an implementation action should be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require permanent open space dedications and protection as part of the development process to mitigate adverse environmental impacts. Open space dedications must be offered to open space park agencies or another entity acceptable to

the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

Furthermore, the General Plan should include a policy or implementation action specifying the timing of any open space dedications. The General Plan should specify that if a conservation easement, conservation easement offer to dedicate (OTD), or fee title dedication is offered in conjunction with County-issued permit or approval, then that conservation easement, OTD, or transfer of deed is required to be recorded prior to the issuance of any permits or recordation of parcel or tract maps. The General Plan should also specify that appropriate entities to accept land transfers or conservation easements include open space park agencies, conservation agencies, or another entity acceptable to the County. Homeowners associations (HOAs) are not appropriate entities to accept such offers, as HOAs sometimes have missions and goals that conflict with the primary purpose of protecting natural land. (Ownership and/or management by HOAs of landscaped or modified areas is appropriate.) The General Plan should also emphasize fee simple dedications and conservation easements over deed restrictions, as they provide the only permanent vehicles for long-term protection of land.

In addition, the General Plan should specify that long-term maintenance funding must accompany any land transfer for the mitigation measure to be complete and sustainable. Open space protection and management requires a permanent funding source that can only be provided by development applicants or the occupiers of their developments. Under all other scenarios the public is shouldered with permanent funding liability. This funding can consist of one of the following options: (1) Community Facilities (Mello-Roos) District, (2) Landscape Maintenance District, or (3) an up front endowment obligation.

### **Trail Dedications**

The General Plan should include a policy or implementation action outlining the conditions under which a trail dedication could be required as part of the development approval process. As we indicated in a previous letter (December 23, 2008, enclosed), an implementation action should be added, which states:

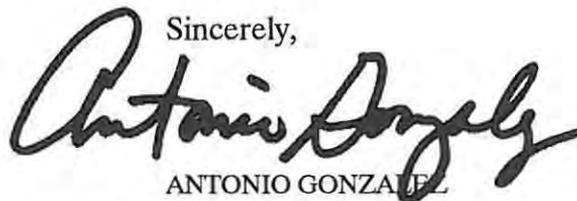
Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require trail easement dedications as part of the development process to mitigate adverse recreational impacts. Trail easement dedications must be offered to open

space park agencies or another entity acceptable to the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

The General Plan should also specify that if a trail easement or trail easement OTD is offered in conjunction with County-issued permit or approval, then that trail easement or OTD must be required to be recorded prior to the issuance of any permits or recordation of the tract map.

Thank you for your consideration of these initial comments. We anticipate submitting additional comments on the Draft 2035 General Plan later. Should you have any questions, please contact Paul Edelman, Deputy Director for Natural Resources and Planning, by phone at (310) 589-3200 ext. 128.

Sincerely,

A handwritten signature in black ink that reads "Antonio Gonzalez". The signature is fluid and cursive, with the first name being larger and more prominent than the last name.

ANTONIO GONZALEZ  
Chairperson

Encs. December 23, 2002 letter from Santa Monica Mountains Conservancy to County of Los Angeles, Department of Regional Planning, re: Comments on Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan

December 23, 2008 letter from Santa Monica Mountains Conservancy to County of Los Angeles, Department of Regional Planning, re: Comments on Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008

**From:** Eric Bruins [eric.bruins@mrca.ca.gov]  
**Sent:** Tuesday, August 30, 2011 7:32 PM  
**To:** Chung, Connie; Hua, Thuy  
**Cc:** Glaser, Mitch  
**Subject:** NOP for AV Area Plan and LA Co GP  
**Attachments:** 2011 Aug GP NOP cover ltr.pdf; 8-29-11 Item 10(a) Comment Letter.pdf; 2011 June LA County GP000.pdf; 2011 June SEA Attachment.pdf; 2011 June TDR Attachment.pdf; 2011 May LA County GP.pdf; 2008 Dec LA County GP.pdf; 2007 Aug LA County GP.pdf; 2004 Jun LA County GP.pdf; 2002 Dec LA County GP.pdf; 2002 SEA sketches000.pdf; 2001 Apr LA County GP.pdf; 2001 SEA sketches000.pdf

Connie and Thuy,

Please see the attached letters in response to the NOP for the DEIRs for your respective plans.

For the General Plan update, I've included the history of Conservancy comment letters on the SEAs and General Plan. We request that our previous comments be included by reference in the DEIR scoping.

Thank you,

-Eric

Eric Bruins  
Mountains Recreation and Conservation Authority  
5810 Ramirez Canyon Road, Malibu, CA 90265  
310-589-3230 ext. 125 [eric.bruins@mrca.ca.gov](mailto:eric.bruins@mrca.ca.gov)



CITY OF BURBANK  
COMMUNITY DEVELOPMENT DEPARTMENT

275 East Olive Avenue, P.O. Box 6459, Burbank, California 91510-6459

[www.ci.burbank.ca.us](http://www.ci.burbank.ca.us)

September 13, 2011

Via Email: [genplan@planning.lacounty.gov](mailto:genplan@planning.lacounty.gov)

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

**Re: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT**

Dear Ms. Chung:

Thank you for the opportunity to review and comment on the Notice of Preparation (NOP) for the Los Angeles County General Plan Update Environmental Impact Report (EIR). It is our understanding that the proposed Project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update would focus on the expected growth in the unincorporated areas with access to services and infrastructure, and examine how to reduce the potential for growth in the County's environmentally sensitive and hazardous areas.

The NOP for the EIR indicates significant growth is expected in the unincorporated areas of Los Angeles County and that the EIR will focus on the primary effects that can be expected to follow from adoption of the comprehensive General Plan Update. The NOP also indicates that the Draft EIR will address the short- and long-term effects of the Los Angeles County General Plan Update and Antelope Valley Area Plan Update on the environment and that mitigation measures will be proposed for those impacts that are determined to be significant.

The City of Burbank requests that the environmental impacts from the expected long term effects of the Los Angeles County General Plan Update on other jurisdictions also be studied and included in the EIR. The City of Burbank seeks clarification as to whether the related impacts of the NBC Universal Evolution plan, which partially includes property in unincorporated Los Angeles County, will be studied in this EIR or only in the project EIR. In addition, would similar projects to the NBC Universal Evolution plan be allowed in other areas of unincorporated Los Angeles County under the proposed General Plan and would the impacts of those projects be studied in this EIR or deferred to project EIRs?

If you would like to discuss this matter, please contact me at [alandry@ci.burbank.ca.us](mailto:alandry@ci.burbank.ca.us) or by telephone at (818) 238-5250.

Sincerely,  
Community Development Department

  
Amanda Landry  
Assistant City Planner

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7, REGIONAL PLANNING  
IGR/CEQA BRANCH  
100 MAIN STREET, MS # 16  
LOS ANGELES, CA 90012-3606  
PHONE: (213) 897-9140  
FAX: (213) 897-1337



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SEP 13 2011

September 8, 2011

IGR/CEQA No. 110830AL-NOP  
LA County General Plan Update and Antelope Valley  
Area Plan Update  
Vic. LA-County Wide  
SCH #: 2011081042

Ms. Connie Chung  
Los Angeles County  
320 W. Temple St., Room 1356  
Los Angeles, CA

Dear Ms. Chung:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs and ordinance. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The project will replace the adopted General Plan (excluding the Housing Element, adopted in 2008) and the adopted Antelope Valley Area Plan.

Caltrans, as the State agency responsible for planning, operations, and maintenance of State highways, shares similar transportation goals with the County. In the spirit of mutual and collaborative planning, we offer our expertise in the areas of transportation modeling, mainline freeway analysis, system and corridor planning, environmental and community impact assessment, as well as identifying critical operational deficiencies affecting freeway congestion, speed, and delay.

For your information, please see excerpts below from the California Environmental Resource Evaluation System website [http://ceres.ca.gov/planning/genplan/gp\\_chapter3.html#circulation](http://ceres.ca.gov/planning/genplan/gp_chapter3.html#circulation) that provides information regarding General Plans that you may find helpful:

“Caltrans is particularly interested in the transportation planning roles of local general plans and suggests that the following areas be emphasized:

- Coordination of planning efforts between local agencies and Caltrans districts.
- Preservation of transportation corridors for future system improvements; and
- Development of coordinated transportation system management plans that achieve the maximum use of present and proposed infrastructure.”

### **Circulation Element**

It is widely known that Southern California highways are heavily congested especially during morning and evening peak periods. We realize that to improve mobility there is the need for capacity enhancing project as well as other innovative alternatives.

New development will increase use of local and regional roadways and the circulation element can identify strategies the County will pursue to maintain good levels of service. We understand that mitigating cumulative traffic impacts may present some challenges. Given that the Los Angeles County's CMP debit and credit system has been suspended, we recommend the County consider an alternate local funding plan towards regional transportation improvements. Local funding efforts may include a region or community wide traffic impact program. We request the County consider implementing a funding program to contribute to improvements on the State highway system, including impacted State Routes, and on/off ramps within the County. Usually, when local matching funds are offered improvements can be streamlined and/or expedited. The County may take this opportunity to include policies that allow it to procure funds towards regional transportation improvements such as freeway connection interchange modifications.

Procuring funds toward freeway segments, freeway interchanges, freeway on/off-ramps, as well as for bus and rail transit facilities should also be in the goals of the County.

We request inclusion in the environmental review process of land use projects within the County General Plan area and all projects that have the potential to significantly impact traffic conditions on State highways. To avoid delays and any misunderstandings in the traffic impact analysis, we request to be involved in its development.

The thresholds for significance on State highway facilities are different than those applied in the Los Angeles County Management Program (CMP). For State thresholds and guidance on the preparation of acceptable traffic studies, please refer to the Statewide Guide for the preparation of Traffic Impact Studies at:

**<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>**

If significant impacts were anticipated on the State highway system the Department would work with the County and applicants to identify appropriate traffic mitigation measures. The policy should include the developer and consultants to consult with Caltrans before any traffic analysis is prepared.

Traffic mitigation alternatives may include vehicular demand reducing strategies, such as incentives for commuters to use transit i.e. park-and-ride lots, discounts on monthly bus and rail passes, vanpools, etc.

### **Land Use Element**

As you are aware, there is a critical relationship between land use and transportation. The quality of the State transportation system operation can affect the quality of the local circulation system operation. The Circulation Element of the General Plan needs to be consistent with the Land-Use and Housing Elements of the General Plan. During the past couple decades,

population and economic growth has been strong in Los Angeles County. Projections show that this growth will continue.

We recommend that special attention be given to the jobs-and-housing balance concept. Communities with predominantly residential allocations should be encouraged to set aside areas for office, commercial/retail, and open space uses. Benefits of balanced communities include: reduction of long morning and evening commutes on State highways, shorter trips which in turn would reduce the consumption of fuel and air pollutants. It may also change direction of trips. Instead of most traffic traveling in one direction during peak periods, some trips may be diverted in the opposite direction. Other land use strategies may include Transit-Oriented Developments (TODs).

### **Housing Element**

As we indicated previously, continued high growth is expected for Los Angeles County, which will have impacts to our State transportation facilities. For large development projects, we ask that efforts be made to provide affordable housing for young workers and seniors to ensure that substantial numbers of employees can afford to purchase homes and live in proposed projects. We also ask that project proponents be encouraged to provide job information on jobs provided along with housing development phases.

We look forward to reviewing the traffic study. We expect to receive a copy from the State Clearinghouse when the Draft EIR is completed. However, to expedite the review process, and clarify any misunderstandings, you may send a copy in advance to the undersigned.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 110830AL.

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



## City of Brea

September 9, 2011

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

Dear Ms. Chung:

I am writing in regard to the Notice of Preparation (NOP) for the proposed Los Angeles County General Plan (GP) Update. The City of Brea has a fundamental interest in future land uses adjacent and near our City and the potential for associated impacts upon our jurisdiction. Many of these lands are within the jurisdictional control of Los Angeles County and we appreciate the opportunity to continue our tradition of communication and coordination on issues of mutual interest.

The City of Brea additionally values the on-going dialog we have historically enjoyed with the primary ownership of the subject lands within Los Angeles County, Aera Energy. Aera's long term vision for these lands includes development and we view coordination and cooperation regarding any proposed plans, or associated land use goals and policies within LA County's General Plan, to be of critical importance to Brea.

With these lands currently positioned within Sphere of Influence, and unincorporated County jurisdiction, we appreciate the opportunity to dialog with Los Angeles County regarding City of Brea interests. We would respectfully request that any Goals and Policies within your General Plan affecting land adjacent or near Brea to be coordinated through a collaborative approach involving our City, with a goal to assure appropriate compatibility between our two jurisdictions. We request direct communication to initiate discussions to facilitate this goal and our staff stands available to meet.

Our comments regarding the NOP are specific to lands abutting or within general proximity to the City of Brea's jurisdictional borders and are provided below:

1. Land Use -- The County's EIR should provide a comprehensive discussion and analysis of the compatibility of the proposed General Plan land use designations and goals and

**City Council**

**Roy Moore**  
*Mayor*

**Dion Schweitzer**  
*Mayor Pro Tem*

**Ron Garcia**  
*Council Member*

**Brett Murdock**  
*Council Member*

**Marty Simonoff**  
*Council Member*

policies as compared to the City of Brea's General Plan land use designations and goals and policies for adjacent and nearby lands. We have included a CD of our General Plan and its EIR for your reference and would specifically call attention to its discussions of hillsides and open space. Appropriate mitigation measures and conditions or modifications to any project approval should be proposed to address any identified impacts.

2. Transportation/Traffic—The EIR should provide a complete analysis of potential traffic impacts from the proposed GP Update and its implementation of land use goals and policies upon Brea streets, intersections, and State Route 57 Freeway ramps. Appropriate mitigation measures and conditions of any project approval should be proposed to address any identified impacts.
3. Aesthetics – The EIR should provide sufficient analysis of potential aesthetic impacts to the City of Brea and should include appropriate mitigation measures to alleviate such impacts. Significant areas of the lands adjacent and nearby Brea are currently undeveloped hillsides which provide a visual backdrop to our City. Changes to the existing land uses which may result in adverse and significant impacts due to the implementation of the proposed GP Update should be comprehensively analyzed for the potential of aesthetic impacts. Methodologies should include view simulations of possible development scenarios for inclusion in the EIR, with views from areas of Brea.
4. Biology/Project Alternatives – Los Angeles County lands abutting and nearby the City of Brea are largely undeveloped and contain a wide variety of biological resources, including importance within a regional wildlife corridor. These considerations should be comprehensively analyzed within the EIR, considered within land use decisions, and adequate resource protections and land preservation goals and policies provided within the GP Update. Review should include an analysis of impacts upon the City of Brea and other agencies which have implemented preservation and conservation of resources specifically related to biology and the wildlife corridor and how the proposed project may affect these efforts. LA County's SEATAC report and comments from prior proposed GP actions for the areas near Brea as well as The Conservation Biology Institute's July 2005 report for this area (*Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor*) should be included within research and analysis. Review of these materials and considerations are also important within the formulation of possible Project Alternatives for land use designation. Where necessary, mitigation measures should be provided to off-set any remaining potential for impacts.
5. Hazards – The EIR should provide a comprehensive analysis and discussion of the hazards potential on the lands abutting and nearby the City of Brea and possible impacts to our jurisdiction. Such impact potential should include review of seismic and geotechnical as well as fire and oil extraction operations and associated potential impacts.

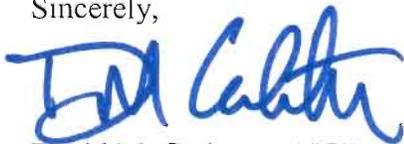
State and Regional Green House Gas goals too should be part of the comprehensive review of impact potential.

6. Utilities and City Services – The EIR should provide a comprehensive analysis of utility and City Service (e.g. Fire Department, Water) needs and impacts to the City of Brea to facilitate the proposed land use element of the GP Update. Utility and Service coordination with our jurisdiction is anticipated to be required to facilitate development plans of these lands and the EIR should provide a complete discussion of such issues together with appropriate mitigation measures to address any anticipated impacts to the City of Brea.
7. Cultural Resources – Oil exploration and extraction is an integral part of Brea’s history. This history is shared with lands adjacent and nearby our jurisdiction and the EIR should provide a complete review of such considerations. Impacts from the proposed land use goals and policies upon cultural and historical resources should be reviewed in the EIR and any necessary mitigation measures to alleviate such impacts provided.

The City of Brea greatly appreciates this opportunity the County of Los Angeles have provided us regarding this project. We respectfully request an appointment to meet to further our understanding of the proposed GP Update and its details as the project moves forward. I stand available to coordinate such communication and would welcome the opportunity to get together and dialog on jurisdictional goals to further our mutual public interests.

Thank you again for the opportunity to comment on the NOP. Please provide us a copy of the Draft EIR once it is available for public review. If you have any questions regarding Brea’s response, please feel free to reach me at 714/990-7674.

Sincerely,



David M. Crabtree, AICP  
Community Development Deputy Director

cc: Tim O’Donnell, City Manager  
Eric Nicoll, Community Development Director  
Charles View, Public Works Director  
Wolfgang Knabe, Fire Chief  
Kevin Kelly, Fire Marshal  
Adrienne Gladson, Senior Planner  
George Bayse, Aera Energy

Enclosures

# CITY OF HAWTHORNE



"CITY OF GOOD NEIGHBORS"

4455 West 126th Street • Hawthorne, California 90250-4482

PLANNING & COMMUNITY DEVELOPMENT

(310) 349-2970  
Fax (310) 644-6685

September 13, 2011

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

Via email: [genplan@planning.lacounty.gov](mailto:genplan@planning.lacounty.gov)

RE: NOP of DEIR, General Plan

Dear Ms. Chung:

Thank you for the opportunity to comment on the Notice of Preparation and Draft General Plan. The City of Hawthorne has concerns with the area referred to as the South Bay Planning Area, and in particular the unincorporated area known as Del Aire.

On page 42 of the Draft General Plan the South Bay Planning Area is characterized as congested, with limited public transportation options, having air quality concerns, and a lack of developable land. In each of these descriptions we agree with the County's assessment. However, on Page 43 Del Aire is singled out as an opportunity area. In the description Inglewood Avenue is described as having "...opportunities for mixed use development..." Inglewood Avenue is a border street between Del Aire (Wiseburn) and Hawthorne only between El Segundo Boulevard to the north and Rosecrans Avenue to the south. In this one mile stretch, Hawthorne occupies the entire east side of Inglewood Avenue and 9.5 of 17 blocks on the west side. The County areas are one lot at the corner of El Segundo Boulevard and Inglewood Avenue (southwest corner), frontage on four blocks between 131st Street and 134th Place, and three blocks between 137th Street and 139th Street. The County's portion of street frontage on Inglewood Avenue in this one-mile stretch, based on blocks, is only 22 percent.

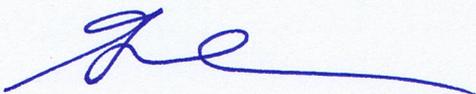
In the City of Hawthorne, all of the street frontage on Inglewood Avenue in this one-mile segment is zoned commercial and developed with commercial properties. The City does not permit mixed use development as an option on this street because the street is too

narrow to handle the additional traffic, there is inadequate public transportation on the street, and the lots are generally too small (even when combined).

Of particular concern is traffic congestion. As part of this update, one section talks about Transit Oriented Districts (TOD) and it further states that areas in proximity to major transit stops provide the best opportunities for higher density housing, mixed uses and civic activities. The TODs guided the increase of residential densities and the allowance of mixed uses along major corridors in the draft land use policy. Inglewood Avenue is one of the major corridors in the South Bay area, however, this four-lane, two-way arterial has limited capacity for both vehicular traffic and for on-street parking. The physical dimensions of Inglewood Avenue cannot accommodate a two-way left-turn lane or even left-turn pockets along the avenue. This further adds to the congestion. The City is concerned that an increase of residential densities and the allowance of mixed use will compound the congestion. The added congestion will further degrade the level of service and the standards of living to our residents, as well as resident of the unincorporated areas.

The City is aware that the County allows a density of 30 units per acre in commercial-zones with mixed use projects. The Proposed General Plan, according to Table 1 (page 4 of NOP), indicated a density of 120. It is unclear if that is "per acre" or not. A density of 30 units per acre for the areas along Inglewood Avenue would be completely overwhelming to the neighborhood and infrastructure, 120 is absolutely unacceptable. The City asks that the County reconsider inclusion of Inglewood Avenue as an opportunity area for mixed use and consider an appropriate type and level of development in harmony with the City of Hawthorne, which occupies most of the west side and all of the east side of this street.

Sincerely,

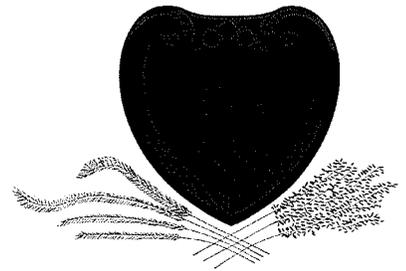
A handwritten signature in blue ink, appearing to read 'Gregg McClain', with a long horizontal flourish extending to the right.

Gregg McClain  
Senior Planner

CC: Arnie Shadbehr, Interim City Manager

# City of San Marino

Planning & Building Department



September 7, 2011

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

**SUBJECT: RESPONSE TO THE NOTICE OF PREPARATION OF A DRAFT  
ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES COUNTY  
GENERAL PLAN UPDATE**

Dear Ms. Chung:

Thank you for the opportunity to review and comment on the Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County General Plan Update. The City of San Marino would appreciate the study of potential traffic impacts and/or potential traffic improvement measures for the East Pasadena-East San Gabriel Opportunity Area.

Please add me as the contact person for San Marino:

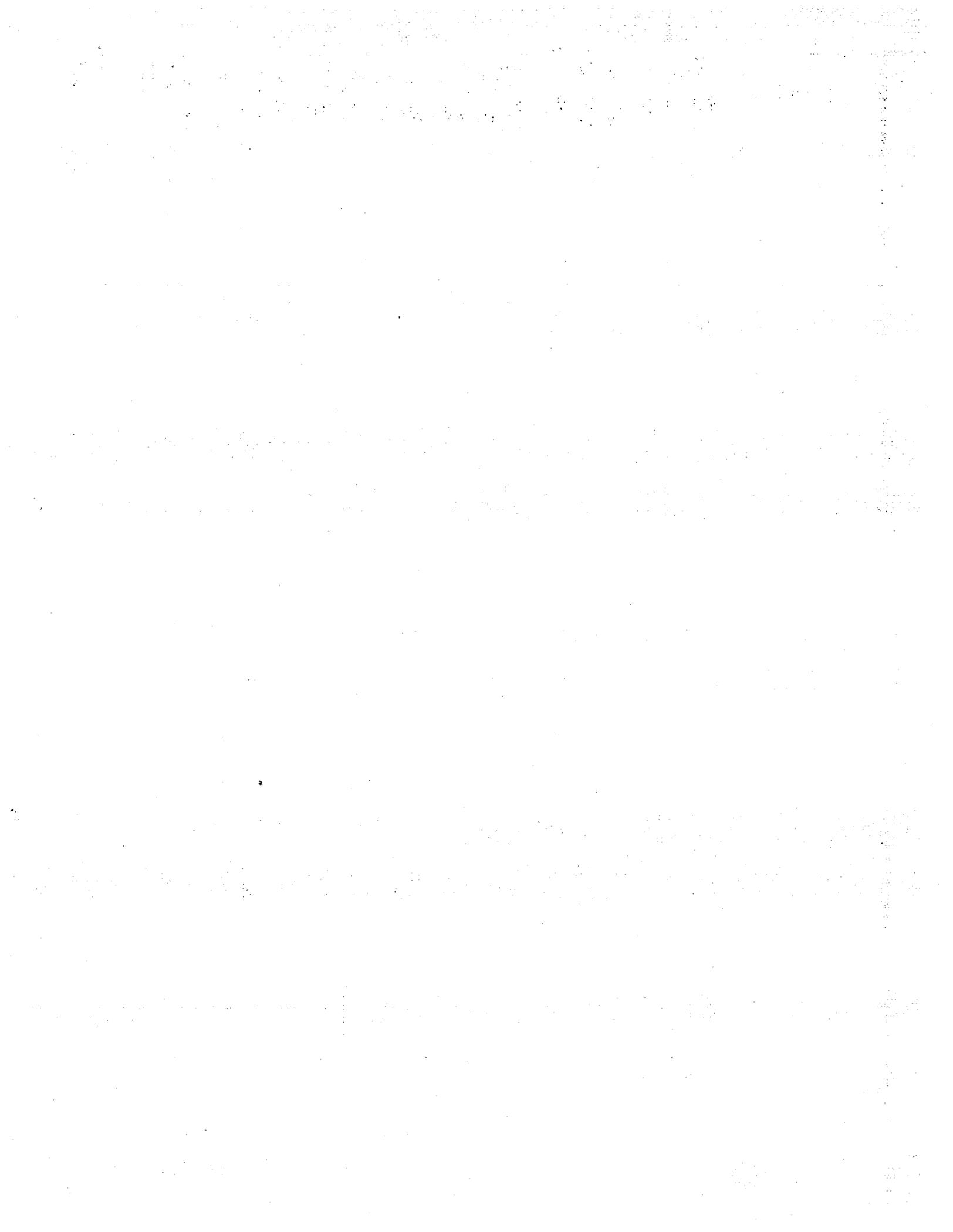
Amanda Merlo, Planning and Building Assistant  
City of San Marino  
2200 Huntington Drive  
San Marino, CA 91108  
626-300-0784  
amerlo@cityofsanmarino.org

Please feel free to contact me should you have any questions or need additional information.

Sincerely,

  
AMANDA MERLO  
Planning and Building Assistant

SEP 12 2011





# DEPARTMENT OF CONSERVATION

*Managing California's Working Lands*

## Division of Oil, Gas, & Geothermal Resources

5816 CORPORATE AVENUE • SUITE 200 • CYPRESS, CALIFORNIA 90630-4731

PHONE 714 / 816-6847 • FAX 714 / 816-6853 • WEB SITE [conservation.ca.gov](http://conservation.ca.gov)

September 6, 2011

Ms. Connie Chung  
Los Angeles County  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012

SEP - 7 2011

### NOTICE OF PREPARATION (NOP) FOR THE GENERAL PLAN UPDATE AND ANTELOPE VALLEY AREA PLAN UPDATE DRAFT ENVIRONMENTAL IMPACT REPORT (EIR), SCH# 2011081042

Dear Ms. Chung:

The Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR), Cypress office, has reviewed the above referenced project. Our comments are as follows:

The proposed project is located within the DOGGR's administrative field boundaries in Los Angeles County. There are idle and plugged and abandoned wells within and adjacent to your proposed project. The DOGGR recommends that all future drill sites, oil production facilities and existing wells within or in close proximity to project boundaries be accurately plotted on future project maps.

The DOGGR is mandated by Section 3106 of the Public Resources Code (PRC) to supervise the drilling, operation, maintenance, and plugging and abandonment of wells for the purpose of preventing: (1) damage to life, health, property, and natural resources; (2) damage to underground and surface waters suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. Furthermore, the PRC vests in the State Oil and Gas Supervisor (Supervisor) the authority to regulate the manner of drilling, operation, maintenance, and abandonment of oil and gas wells so as to conserve, protect, and prevent waste of these resources, while at the same time encouraging operators to apply viable methods for the purpose of increasing the ultimate recovery of oil and gas.

The scope and content of information that is germane to the DOGGR's responsibility are contained in Section 3000 et seq. of the Public Resources Code (PRC), and administrative regulations under Title 14, Division 2, Chapter 4 of the California Code of Regulations.

An operator must have a bond on file with the DOGGR before certain well operations are allowed to begin. The purpose of the bond is to secure the state against all losses, charges,

and expenses incurred by it to obtain such compliance by the principal named in the bond. The operator must also designate an agent, residing in the state, to receive and accept service of all orders, notices, and processes of the Supervisor or any court of law.

Written approval from the Supervisor is required prior to changing the physical condition of any well. The operator's notice of intent (notice) to perform any well operation is reviewed on engineering and geological basis. For new wells and the altering of existing wells, approval of the proposal depends primarily on the following: protecting all subsurface hydrocarbons and fresh waters; protection of the environment; using adequate blowout prevention equipment; and utilizing approved drilling and cementing techniques.

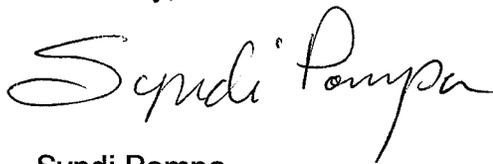
The DOGGR must be notified to witness or inspect all operations specified in the approval of any notice. This includes tests and inspections of blowout-prevention equipment, reservoir and freshwater protection measures, and well-plugging operations.

The DOGGR recommends that adequate safety measures be taken by the project manager to prevent people from gaining unauthorized access to oilfield equipment. Safety shut-down devices on wells and other oilfield equipment must be considered when appropriate.

If any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the DOGGR's Cypress district office must be contacted to obtain information on the requirements for and approval to perform remedial operations.

If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office (714) 816-6847.

Sincerely,

A handwritten signature in cursive script that reads "Syndi Pompa". The signature is written in black ink and is positioned to the left of the typed name.

Syndi Pompa  
Associate Oil & Gas Engineer - Facilities



BOARD OF DIRECTORS

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Clark Stevens, AIA

September 14, 2011

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

**RE: NOP- EIR Comments for the Los Angeles County General Plan Update**

Dear Ms. Chung,

On behalf of the Resource Conservation District of the Santa Monica Mountains (RCDSMM), we thank you for the opportunity to submit comments on the NOP for the Los Angeles County General Plan Update. We would like the following to be addressed in the EIR for the Plan Update:

General Comments:

- What is the vision for how LA County will function in 50 years?
- How will implementation of this General Plan translate into on the ground stewardship and sustainability?
- What metrics will be used to evaluate the effectiveness of these policies?
- Have any metrics been used to evaluate the goals of the 1986 plan vs. what is currently on the ground? An assessment of what worked or did not would be extremely helpful in guiding the future course of planning.
- We recommend that you incorporate the "let the land dictate the use" principle of the Santa Monica Mountains North Area Plan into the general plan.
- How will the updated plan integrate ecosystems services cost-benefit analysis in all aspects of planning?

- How will the County promote an integrated environmental site analysis into the first steps of the planning process to ensure that ecosystem elements are identified and considered so that preliminary designs brought for evaluation by the Initial Study are clearly aligned with the goals and policies of the General Plan?
- Will Public Works and Utilities be required to adhere to all the environmental constraints required of private parties? If not, why not?
- In the Implementation Plan, the Green Streets Initiative should specify that climate-appropriate (and preferably California natives) will be used as the material for landscaping "urban green spaces".
- The plan should recognize and integrate long term processes into the evaluation of potential impacts to allow for ecological resiliency. This requires on-going dialogue and implementation of up to date information from local scientists that can be integrated into the planning process.

#### Land Use:

- 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 should reconfigure zoning to reflect those issues and direct development into better locations.
- How can preservation of agricultural opportunities be integrated with wise management and conservation of chaparral and other native ecosystems?
- Land use compatibility narrative should also consider impacts to open space from fuel modification, type conversion from native habitats to agriculture.

#### Planning for Sustainable and Livable Communities Section:

How can infrastructure services (energy, water, sewer, trash, etc.) 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?

- Sustainable Subdivision Design should also recommend preventing habitat fragmentation, retention of storm water, localized production of appropriate energy, water conservation and reuse

#### Air Quality:

- Responding to climate change section 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.

### Conservation and Open Space

- How are private open space easements tracked and monitored?
- We agree that a coordinated open space master plan is needed.
- Since open space can include anything from golf courses to wildlands, what are the guidelines for designating specific requirements for open space preservation and integration into the fabric of wild lands?
- It is important to identify and call out dark sky role as important resource ; regulation of night lighting and providing places where residents can see the stars very important.

### Biological Resources:

- In Appendix C. 1, do the Special Management Areas overlap? If they do, the County should provide 3 separate maps to depict Special Management Areas 1, 2 and 3.
- What are the criteria or methods used to update the Significant Ecological Areas? Does the County provide SEA's as a parcel-level layer in the GIS maps online? This would facilitate evaluating impacts of individual projects on these areas.
- Please label the Regional Wildlife Linkage Areas in Figure 6.3 of the General Plan Update.
- How will the County specifically support or implement the L.A. County Oak Woodlands Conservation Management Plan? Will it be part of the policy and or goals of the Conservation Element? The text box on page 109 should reflect adoption of Part 1 of the Oak Woodlands Conservation Management Plan in August 2011. We are appreciative of the inclusion of this in the General Plan Update.
- One goal of the Conservation Element should be to provide a measurable distance of setback between new development and riparian zones.
- The Plan Update should identify the relationship between fuel modification requirements and type conversion of native habitats, and provide policy guidance to reduce these impacts, especially adjacent to public open spaces.

### Open Space:

- How are private open space easements tracked and monitored? We agree that a coordinated open space master plan is needed.
- Since open space can include anything from golf courses to wild lands, what are the guidelines for designating specific requirements for open space preservation and integration into the fabric of wild lands?

### Water Quality/Resources:

- The Plan should identify ways that each landowner can implement water conservation through rainwater harvesting, infiltration, reuse, etc.

- Marine Protected Areas information should be added to the section following discussion on Areas of Special Biological Significance on pg 112.
- Given the requirements of TMDL's and other regulatory standards, we need to make clear connection between sources of bacteria and pathogenicity.

#### Agriculture:

- Vineyards are not identified as a commodity in Table 6.2 (pg 116) and should be added.
- The plan should review agricultural resource areas and correlate these with remaining native vegetation communities to identify and track impacts.
- The plan should identify and implement strict standards for protecting slopes from agricultural conversion that results in erosion, sedimentation and slope failure.

#### Mineral and Energy Resources:

- Prioritize local sources of energy 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.

#### Scenic Resources:

- The plan should implement stringent regulations to avoid impacts of ridgetop development.
- Many other highways throughout the County provide significant vistas. Additional potential scenic highway designations to protect other important transportation corridor vistas should be considered.

#### Historical, Cultural and Archeological Resources:

- The plan should recognize 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.

#### Parks and Recreation:

- 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. Continue implementation of pocket parks wherever possible.

### Safety:

- 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.

### Public Services and Facilities:

- 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.

### Water:

- With only 33% of water supply local, conservation and landscape restrictions are critical!

### Wastewater and sewer:

- The plan should recognize 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 program that can be fairly and equitably be implemented is critical.

### Utilities:

- Siting should 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, and 4) reduce system wide malfunctions.
- Utility companies should comply with all best management practices and environmental protection standards imposed on private developers.

### Economic Development:

- Given the need for promoting jobs locally, provide an integrated plan that connects jobs more directly to transportation and housing by clustering.
- Recognize that economic growth in LA County is directly tied to our environment - extensive portions of local economy tourist driven and reliant upon a functional ecosystem from the beaches to the mountains. Avoid fostering short-term growth at the expense of long term sustainability and economic value.

## IMPLEMENTATION PLAN:

The plan should identify and incorporate incentives for land conservation via easements or dedications accompanied by property tax reductions.

### Environmental Resource Management

- Habitat Conservation Planning should extend to all native ecosystems, and incorporate an effective tracking system to provide annual assessment of changes to biological resources countywide.
- We also recommend adding the following issues to the Environmental Resource Management Table:

#### **Invasive species Tracking and Response Strategy:**

This is critical to manage introduced threats such as the Gold Spotted Oak Borer and New Zealand Mud Snail, which can dramatically reduce ecosystem viability and cause significant mortality.

#### **Ecosystem response to climate change and type conversion:**

This would allow the County to monitor landscape level changes to local ecosystems related to fire frequency, development and shifts in species distribution and abundance in response to climate changes. An early warning system such as this could be developed in collaboration with local scientists and universities to provide the county with the opportunity for rapid response to region wide changes.

### Agricultural Monitoring Program

- Vineyard expansion into native ecosystems, especially on steep slopes has potentially significant impacts, as does that from orchard, row crop or animal husbandry. The County General Plan should provide for tracking such change and develop appropriate guidelines to promote needed agriculture developed such that natural systems remain functional as well.

### Water Resources Program

- The Water Quality Initiatives section should also include education and potentially regulations to reduce urban run off from landscaping.
- The Watershed and River Master Plan should include work to restore the Los Angeles and San Gabriel rivers, as well as Ballona Creek.
- Water conservation should emphasize onsite reuse via rainwater harvesting (cisterns, graywater, etc.) and in general should seek to slow and naturalize stormwater runoff and avoid creating hardened and focused discharges

### Special Management Area Programs:

- We support the development of countywide ridgeline protection regulations.
- Why is the Local Coastal Plan not listed here?

- Floodplain management goals are only as good as the calculations that determine the extent of the flood zone. The Plan should ensure that the reference condition used to develop Q values is the natural, undisturbed condition, rather than a 50 year bulk and burned Q. The Plan should also incorporate protection to downstream properties when upstream development alters the hydrologic regime of a waterway.
- The Implementation Section is missing a critical element of self-evaluation and identification of benchmark metrics that would provide the County with on-going feedback regarding whether the goals and policies of the plan are being met.

We are thankful for the opportunity to participate during the scoping phase of the EIR the Los Angeles County General Plan Update. As a Resource Conservation District, we support sustainable land use: growth balanced with conservation of the unique and finite natural resources of the County. We also understand the importance of this planning document as a guide for responsible stewardship within the County.

If you have any questions regarding this letter please contact me directly.

Sincerely,

Clark Stevens  
Executive Officer



*Geroy D. Baca, Sheriff*

*County of Los Angeles*  
**Sheriff's Department Headquarters**

*4700 Ramona Boulevard  
Monterey Park, California 91754-2169*



September 12, 2011

Mr. Richard Bruckner  
Director of Planning  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1356  
Los Angeles, California 90012

Dear Mr. Bruckner:

Attention: Ms. Connie Chung

**REVIEW COMMENTS  
NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT  
LOS ANGELES COUNTY GENERAL PLAN UPDATE  
ANTELOPE VALLEY AREA PLAN UPDATE  
(STATE CLEARINGHOUSE NO. 2011081042; LASD/FPB PROJECT NO. 11-036)**

The Los Angeles County Sheriff's Department (Department) submits the following review comments on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Los Angeles County General Plan Update and Antelope Valley Area Plan Update (Project). The proposed Project is a comprehensive update of the Los Angeles County General Plan (GP) and the Antelope Valley Area Plan (AP). The GP and AP cover unincorporated areas of Los Angeles County, and address growth management issues in anticipation of continued development in the region. The proposed Project will replace the currently-adopted GP (excluding the Housing Element) and AP.

The proposed Project was reviewed by the Los Angeles County Sheriff's Department (Department). The GP was reviewed by the Department's Facilities Planning Bureau (FPB) and the AP was reviewed by the Department's Lancaster and Palmdale Stations.

In summary, the proposed Project, as it is described in the GP and AP, is not expected to negatively impact law enforcement services in the Department's patrol areas. The Department is generally supportive of the proposed Project because managed growth could help the Department allocate current resources and identify future needs within our jurisdictional boundaries.

*A Tradition of Service Since 1850*

Other than an apparent typographical error on Page 45 of the AP (see Paragraph 2 of the *Crystalair* section; see also the attached comment letter, dated August 24, 2011, from Palmdale Station Captain Bobby D. Denham), the Department has no comments to submit at this time. However, the Department reserves the right to further address this matter in subsequent reviews of the proposed Project.

Thank you for including the Department in the environmental review process for the proposed Project. Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012 and refer to Facilities Planning Bureau Tracking No. 11-036. You may also contact Mr. Miyoshi, via e-mail, at [Lhmiyosh@lasd.org](mailto:Lhmiyosh@lasd.org).

Sincerely,

LERROY D. BACA, SHERIFF

A handwritten signature in black ink, appearing to read "Gary T. K. Tse". The signature is written in a cursive, flowing style.

Gary T. K. Tse, Director  
Facilities Planning Bureau

Mr. Bruckner

-3-

September 12, 2011

GTKT:LM:lm/jh

Attachments

c: Don Ford, Lieutenant, Palmdale Station  
Paul G. Murphy, Deputy, Palmdale Station  
Michael L. Kuper, Deputy, Lancaster Station  
Lester Miyoshi, Project Manager, Facilities Planning Bureau  
Chrono  
(EIR-NOP-AntelopeValleyAreaPlanUpdate)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**

OFFICE CORRESPONDENCE

DATE 08/31/2011  
FILE NO.

**FROM:**

  
Robert Jensen, Captain  
Lancaster Station

**TO:**

Gary T.K. Tse  
Director,  
Facilities Planning Bureau

**SUBJECT:**

Notice of Preparation (NOP) 2011-08-15

We have received your request for comments regarding the Los Angeles County General Plan Notice of preparation, specifically, the Antelope Valley Area Plan.

Lancaster Station's jurisdictional boundaries include the unincorporated county areas of Quartz Hill, Antelope Acres, Lake Los Angeles, and Hi-Vista.

We are generally supportive of the proposed Plan Update because it is intended to address future growth issues in the Antelope Valley, which includes our jurisdictional boundaries. We look forward to reviewing the Draft EIR for the plan update, particularly the discussions of goals, policies, implementing programs, and ordinances that address such future growth issues. We are hopeful that those discussions will also address issues that are of particular interest to us, such as those identified below.

Overall, police protection service within the aforementioned areas is adequate, and with the implementation of innovative law enforcement programs, improving.

Law enforcement needs for the unincorporated areas of Los Angeles County patrolled by Lancaster Station are determined annually. They are based on several factors including, but not limited to, population increases, numbers of calls for service, response times, traffic accidents, arrests, bookings, and patrol miles.

There are no immediate plans to construct any new police facilities in any of the unincorporated areas of the Antelope Valley. However, as the valley develops, and the population increases, additional facilities may become necessary.

If we can be of further assistance, feel free to contact Deputy Michael Kuper, Monday through Friday, 8:00 a.m. to 4:00 p.m., 661-948-8466, extension 4019.

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
"A TRADITION OF SERVICE"

OFFICE CORRESPONDENCE

DATE: August 24, 2011

FILE NO.

FROM:

  
BOBBY D. DENHAM, CAPTAIN  
PALMDALE STATION

TO: GARY TSE, DIRECTOR  
FACILITIES PLANNING BUREAU

SUBJECT: ANTELOPE VALLEY AREA PLAN UPDATE

My staff has reviewed the documents related to the update of the Antelope Valley area plan, also known as Town and Country. The areas of the plan affecting Palmdale Station's area were identified as Acton, Crystalaire, Eldorado and White Fence Farms, Lake Elizabeth, Lake Hughes, Green Valley, Juniper Hills, Lakeview, Leona Valley, Littlerock, Sun Village, Llano, and Pearblossom.

Our review of the draft plan revealed no significant law enforcement concerns for Palmdale Station. There are some high density housing sections in Quartz Hill that should be examined by Lancaster Station for possible impact to their delivery services. The H-30 designated zones are already existing facilities (The Quartz Hill Mobile Home Park and the Mayflower Gardens Senior Facility), however, the H-18 areas along 50<sup>th</sup> Street West includes some future high density development.

We did note an error on Page 45 under the Crystalaire section. Paragraph 2 states, "The community does not have a Rural Town Center area but is served by the Rural Town Center in ably." This appears to be an omission of the nearest Rural Town Center, probably Pearblossom, and does not affect our analysis.

We have no objections to the proposed plan update as presented in these documents. If you have any questions or need additional information, please contact Lieutenant Don Ford at (661) 272-2541.

BDD:DPF:dpf

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-5390  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
ds\_nahc@pacbell.net



August 17, 2011

AUG 22 2011

Ms. Connie Chung, AICP, Supervising Regional Planner

**Los Angeles County Regional Planning Department**

320 West Temple Street, Room 1356  
Los Angeles, CA 90012

Re: SCH#2011081042 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the "General Plan Update and Antelope Valley Area Plan Update Project;" includes the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region (excluding the Housing Element adopted in 2008), and the adopted Antelope Valley Aareaa Plan; Los Angeles County, California.

Dear Ms. Chung:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3<sup>rd</sup> 604). The NAHC wishes to comment on the above-referenced proposed Project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were and are identified within the 'area of potential effect (APE), the unincorporated areas of Los Angeles County. Also, the absence of archaeological items at the surface level does not preclude their existence at the subsurface level once ground-breaking activity is underway. Consultation with area Native American tribes on the attached list will provide more detailed information of the areas of cultural sensitivity within Los Angeles County including Santa Catalina and San Clemente islands.**

The NAHC 'Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore we recommend, also, that you contact the California Historic Resources Information System (CHRIS) California Office of Historic Preservation for pertinent archaeological data within or near the APE, at (916) 445-7000 for the nearest Information Center in order to learn what archaeological fixtures may have been recorded in the APE.

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. If cultural resources are identified, the preference of the NAHC is *avoidance*, pursuant to CEQA Guidelines Section 15370(a).

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

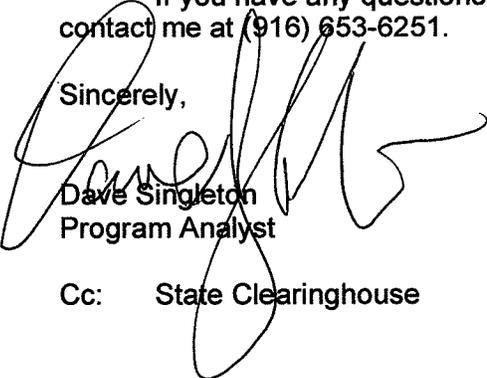
To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

The response to this search for Native American cultural resources is conducted in the NAHC Sacred Lands Inventory, established by the California Legislature (CA Public Resources

Code 5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code 6254.10) although Native Americans on the attached contact list may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance" may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places and there may be sites within the APE eligible for listing on the California Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton  
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

**California Native American Contact List**  
Los Angeles County  
August 17, 2011

Charles Cooke  
32835 Santiago Road  
Acton , CA 93510  
suscol@intox.net

Chumash  
Fernandeno  
Tataviam  
Kitanemuk

(661) 733-1812 - cell  
suscol@intox.net

Beverly Salazar Folkes  
1931 Shadybrook Drive  
Thousand Oaks, CA 91362  
folkes@msn.com  
805 492-7255  
(805) 558-1154 - cell  
folkes9@msn.com

Chumash  
Tataviam  
Ferrnandeño

Owl Clan  
Dr. Kote & Lin A-Lul'Koy Lotah  
48825 Sapaque Road  
Bradley , CA 93426  
mupaka@gmail.com  
(805) 472-9536

Chumash

San Manuel Band of Mission Indians  
James Ramos, Chairperson  
26569 Community Center Drive  
Highland , CA 92346  
(909) 864-8933  
(909) 864-3724 - FAX  
(909) 864-3370 Fax

Serrano

Fernandeno Tataviam Band of Mission Indians  
Ronnie Salas, Cultural Preservation Department  
601 South Brand Boulevard, Suite 102  
San Fernando CA 91340  
**rsalas@tataviam-nsn.gov**  
(818) 837-0794 Office

Fernandeno  
Tataviam

(818) 837-0796 Fax

Barbareno/Ventureno Band of Mission Indians  
Julie Lynn Tumamait, Chairwoman  
365 North Poli Ave  
Ojai , CA 93023  
jtumamait@sbcglobal.net  
(805) 646-6214

Chumash

Patrick Tumamait  
992 El Camino Corto  
Ojai , CA 93023  
(805) 640-0481  
(805) 216-1253 Cell

Chumash

LA City/County Native American Indian Comm  
Ron Andrade, Director  
3175 West 6th St, Rm. 403  
Los Angeles , CA 90020  
randrade@css.lacounty.gov  
(213) 351-5324  
(213) 386-3995 FAX

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**California Native American Contact List**  
Los Angeles County  
August 17, 2011

Owl Clan  
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Bradley , CA 93426  
mupaka@gmail.com  
(805) 472-9536 phone/fax  
(805) 835-2382 - CELL

Ti'At Society/Inter-Tribal Council of Pimu  
Cindi M. Alvitre, Chairwoman-Manisar  
3098 Mace Avenue, Aapt. D Gabrielino  
Costa Mesa, , CA 92626  
calvitre@yahoo.com  
(714) 504-2468 Cell

Tehachapi Indian Tribe  
Attn: Charlie Cooke  
32835 Santiago Road Kawaiisu  
Acton , CA 93510  
suscol@intox.net  
(661) 733-1812

Tongva Ancestral Territorial Tribal Nation  
John Tommy Rosas, Tribal Admin.  
Private Address Gabrielino Tongva  
  
**tattnlaw@gmail.com**  
310-570-6567

Kitanemuk & Yowlumne Tejon Indians  
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981 N. Virginia Yowlumne  
Covina , CA 91722 Kitanemuk  
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San Fernando Band of Mission Indians  
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**tsen2u@hotmail.com** Serrano  
(661) 753-9833 Office Vanyume  
(760) 885-0955 Cell Kitanemuk  
(760) 949-1604 Fax

Gabrieleno/Tongva San Gabriel Band of Mission  
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San Gabriel , CA 91778  
GTTribalcouncil@aol.com  
(626) 286-1632  
(626) 286-1758 - Home  
(626) 286-1262 -FAX

Randy Guzman - Folkes  
655 Los Angeles Avenue, Unit E Chumash  
Moorpark , CA 93021 Fernandefio  
**ndnRandy@yahoo.com** Tataviam  
(805) 905-1675 - cell Shoshone Paiute  
Yaqui

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## California Native American Contact List

Los Angeles County

August 17, 2011

Gabrielino Tongva Nation  
Sam Dunlap, Chairperson  
P.O. Box 86908  
Los Angeles, CA 90086  
**samdunlap@earthlink.net**

Gabrielino Tongva

(909) 262-9351 - cell

Kawaiisu Tribe of Tejon Reservation  
David Laughinghorse Robinson  
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Kernville, CA 93238  
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(661) 664-7747 - home  
horse.robinson@gmail.com

Coastal Band of the Chumash Nation  
Vennise Miller, Chairperson  
P.O. Box 4464 Chumash  
Santa Barbara CA 93140  
805-305-5517

Kern Valley Indian Council  
Julie Turner, Secretary  
P.O. Box 1010 Southern Paiute  
Lake Isabella, CA 93240 Kawaiisu  
(661) 366-0497 Tubatulabal  
(661) 340-0032 - cell Koso  
Yokuts

San Manuel Band of Mission Indians  
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abrierty@sanmanuel-nsn.gov  
(909) 862-5152 Fax

Gabrielino Tongva Indians of California Tribal Council  
Robert F. Dorame, Tribal Chair/Cultural Resources  
P.O. Box 490 Gabrielino Tongva  
Bellflower, CA 90707  
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562-761-6417 - voice  
562-761-6417- fax

Carol A. Pulido  
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**California Native American Contact List**  
Los Angeles County  
August 17, 2011

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Chumash

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Gabrielino Tongva

Gabrielino-Tongva Tribe  
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Aylisha Diane Marie Garcia Napoleone  
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Gabrielino-Tongva Tribe  
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626-676-1184- cell  
(310) 587-0170 - FAX  
760-904-6533-home

Santa Ynez Tribal Elders Council  
Freddie Romero, Cultural Preservation ConsInt  
P.O. Box 365 Chumash  
Santa Ynez , CA 93460  
805-688-7997, Ext 37  
freddyromero1959@yahoo.  
com

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## PUBLIC UTILITIES COMMISSION

320 WEST 4<sup>TH</sup> STREET, SUITE 500  
LOS ANGELES, CA 90013



September 9, 2011

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

Dear Ms. Chung:

Re: SCH# 2011081042: General Plan Update and Antelope Valley Area Plan Update

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings.

The Commission's Rail Crossings Engineering Section (RCES) is in receipt of the *Notice of Completion & Environmental Document Transmittal-Notice of Preparation* from the State Clearinghouse for the General Plan Update and Antelope Valley Area Plan Update (Project). As the state agency responsible for rail safety within California, we recommend that the County add language to the Project so that any future planned development adjacent to or near the railroad right-of-way is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

Language should be in place so that any traffic impact studies undertaken should also address vehicular and pedestrian traffic volumes increase impacts over the affected crossing(s) and associated proposed mitigation measures.

If you have any questions in this matter, please contact Jose Pereyra, Utilities Engineer at 213-576-7083, [jfp@cpuc.ca.gov](mailto:jfp@cpuc.ca.gov), or myself at [rxm@cpuc.ca.gov](mailto:rxm@cpuc.ca.gov), 213-576-7078.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosa Muñoz".

Rosa Muñoz, PE  
Senior Utilities Engineer  
Rail Crossings Engineering Section  
Consumer Protection & Safety Division

SEP 12 2011



Puente Hills Landfill  
Native Habitat Preservation Authority

September 8, 2011

County of Los Angeles  
Department of Regional Planning  
General Plan Development Section  
Attn: Connie Chung, Supervising Regional Planner  
320 West Temple Street  
Los Angeles, CA 90012

**Comments on Notice of Preparation for the Los Angeles County General Plan Update and Antelope Valley Area Plan Update**

Dear Ms. Chung:

The Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the Notice of Preparation (NOP) for the Los Angeles County General Plan Update and Antelope Valley Area Plan Update.

The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to our mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency will endeavor to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority owns and or manages over 3,800 acres which lie within the Cities of Whittier and La Habra Heights as well as in the County unincorporated area of the Puente Hills known as Hacienda Heights and Rowland Heights.

The Habitat Authority is concerned regarding adjacent, non-conserved open space lands and the impact that development on these lands could have on the Puente Hills Preserve. These impacts could include edge effects to wildlife and habitat (such as increased noise, light, human presence, domestic pets), increases in traffic or recreational use, or constriction or blockage of wildlife movement corridors. The Draft EIR must evaluate the potential impacts that the type, extent, and location of any development permitted within SEAs may have on adjacent and connected habitats and include mitigation measures for any significant impacts.



If the proposed Puente Hills SEA boundaries remain unchanged from those included in the Draft 2035 General Plan Update dated April 5, 2011, then the Draft EIR must include a detailed analysis as to why the extremely narrow corridor proposed at Harbor Blvd. will not significantly impact wildlife movement through the Puente-Chino Hills Wildlife Corridor. There is evidence of wildlife movement through this area, and we have strong concerns that any construction of this corridor could significantly impact wildlife movement and consequently threaten the viability of wildlife populations to the west in the Puente Hills Preserve. In addition, if the proposed Puente Hills SEA boundaries remain unchanged, then an alternative should be considered in the DEIR that would include a wider habitat corridor at Harbor Blvd.

Please also consider an alternative that would include other portions of the Puente Hills Preserve in the Puente Hills SEA which are currently excluded, and the proposed Rio Hondo SEA. These areas are all physically connected and including them all within the same SEA would further promote the goals of the Draft General Plan for maintaining habitat connectivity and wildlife movement.

Please consider in the Draft EIR compatibility of the General Plan as it affects recreation and natural resource values of the Preserve. The Habitat Authority is concerned with how future County ordinances and plans will affect our ability to restore, manage and provide improved recreational and educational opportunities within our properties. Please see our previous comments sent in an email dated August 28, 2007 and attached hereto addressing these management issues.

Thank you for your consideration of our comments. Previously submitted comments by the Habitat Authority dated August 29, 2007 are also attached for your reference. Feel free to contact me or Andrea Gullo, Executive Director, at (562) 945-9003 for further discussion.

Sincerely,



Bob Henderson  
Chairman

cc: Board of Directors  
Citizens Technical Advisory Committee

Attached:

Previously submitted Habitat Authority email dated August 28, 2007, and letter dated August 29, 2007.

From: Andrea Gullo [<mailto:agullo@habitatauthority.org>]  
Sent: Tuesday, August 28, 2007 5:37 PM  
To: 'jlowry@planning.lacounty.gov'  
Subject: SEA concerns

Julie-

I'm confirming with our Ecologist about the 9/12 date for a meeting with you and the other county staff to discuss the General Plan- I'll get back to you soon.

Here are some of our concerns about the SEA designation - In addition to the comments below, we would also like to be exempted from SEA review for building structures, trails or trailheads that further our mission of preserving and managing open space.

#### Proposed SEA Ordinance:

From time to time the Habitat Authority will propose improvements to the open space such as low impact recreational trailheads, trails, wildlife road underpasses, or fences to limit illegal off-road activity on protected preserve areas. Our intentions with these and similar projects are to design them around the existing biological resources to ensure the resources will continue to function and even flourish. We recommend that open space management activities of this nature be considered as compatible and appropriate within a SEA.

On page 3 of the proposed Ordinance, Section D1d) Please include in the exemption from the ordinance the installation of an office as an accessory building for open space management activities. Also please include the demolition of a structure exempt from this ordinance.

D1f) Please include goats as an animal allowed to graze as part of a well-defined habitat management program.

D1g) Please allow for the construction and maintenance of locally designated trails in addition to federally, state and county designated trails. The Habitat Authority is responsible for 25 miles of trails within its jurisdiction and needs to constantly perform maintenance on them.

D1h) From time to time the Habitat Authority conducts informal scientific studies in the hills such as bird and wildlife surveys and photodocumentation. Please add this as an exempted use in the proposed ordinance. It is unclear what the definition is of the phrase "regulated scientific study" used in this section.

D1j) From time to time as a part of open space management practices the Habitat Authority may remove much more than 2.5 acres of non native vegetation on public property not required by the Fire Department, but for ecological enhancement and habitat management reasons. Please include these activities in the ordinance.

Also, please include as an exempted activity typical restoration activities for promoting native habitat, including the broadcasting of native seeds, installation of temporary irrigation, installation of container stock, and application of herbicides.

Also, please include as an exemption installation of devices designed to aid in the management of biotic resources such as manmade bat boxes, burrowing owl boxes or raptor perches.

In regards to section J6) More than road signs are needed to mitigate impaired wildlife movement. Please consider adding creation of wildlife underpasses or overpasses as a condition to protect ecological resources.

Also, there are other methods of mitigating road impacts to wildlife that can be further explored by visiting the websites <http://roadecology.ucdavis.edu/about.html> , <http://www.itre.ncsu.edu/CTE/index.asp> , <http://www.fhwa.dot.gov/environment/wildlifecrossings/> .

Thanks for your time in reviewing these - I'll email you our final comment letter as well.

Andrea



Puente Hills Landfill  
Native Habitat Preservation Authority

August 29, 2007

County of Los Angeles  
Department of Regional Planning  
General Plan Development Section  
Attn: Mark Herwick, General Plan Section Head  
320 West Temple Street  
Los Angeles, CA 90012

**Comments on Draft Los Angeles County General Plan**

Dear Mr. Herwick:

The Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the draft General Plan.

The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to our mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency will endeavor to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority's jurisdiction extends within eastern Los Angeles County approximately from the intersection of the 605 and 60 Freeways in the west to Harbor Boulevard in the east. The Habitat Authority owns and or manages 3,860 acres which lie within the Cities of Whittier and La Habra Heights as well as in the County unincorporated area of the Puente Hills known as Hacienda Heights and Rowland Heights.

**Proposed Puente Hills Significant Ecological Area (SEA) Delineation:**

The Habitat Authority supports in concept the proposed expansion of the Puente-Chino Hills Significant Ecological Area (SEA), and we support our properties being included within the SEA. The County's efforts to propose protection of wildlife habitat as a part of the land use element in the general plan are commendable. In order to maintain the integrity of the scientific work conducted, we recommend that the boundaries of the SEAs proposed by County consultants (PCR 2000) not be reduced even outside of the unincorporated area without further scientific evidence to support that change. In addition, there are several areas for which the biological evidence supports their inclusion within this SEA.



The open space of the Puente Hills between Harbor Blvd. and State Route 57 has been previously shown to be of great conservation concern to the entire Puente-Chino Hills corridor, both for its value in linking the west and east corridor (cite: Missing Middle) as well as because of its intrinsic value in supporting significant populations of sensitive animal species.

The current boundaries of the proposed Puente Hills Significant Ecological Area purport to encompass the significant open space of this portion of the hills, but as currently drawn, they omit a critically-important portion of the open space in unincorporated Los Angeles County: the southwestern corner of the Aera project area, which extends east from Harbor Blvd.

An aerial photo of the area in question is in Figure 1. This shows well the mosaic of habitat dominated by extensive, intact grassland (native/non-native mix), which appears tan in color. Southern California black walnut woodland (dark green) and coastal sage scrub (gray-green, lower right) comprise the other two main habitat types.



Figure 1. "Aera" region of Puente Hills.

The proposed boundaries of the SEA are reproduced in Figure 2 (in green). This configuration clearly excludes the entire southwestern corner of the Aera project area (lower left), which is marked with a red arrow in Figure 3.

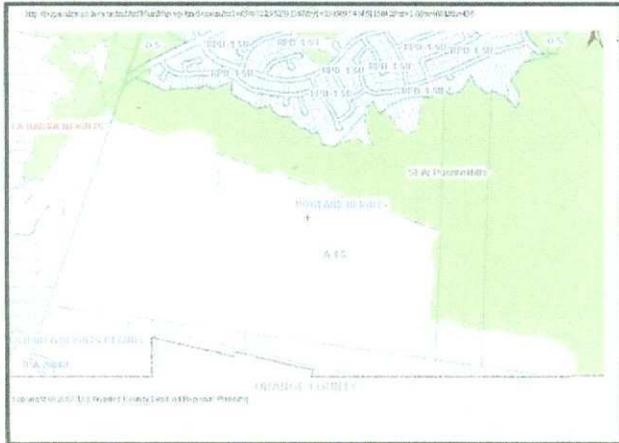


Figure 2. Map of Aera project portion of Puente Hills SEA, from Los Angeles Co. General Plan update.

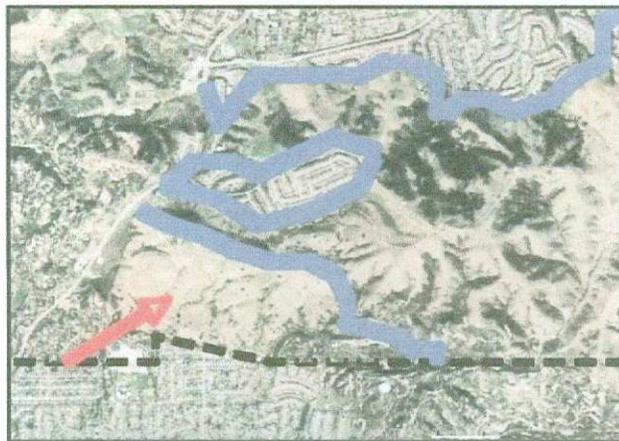


Figure 3. Red arrow denotes "missing corner" of Aera project area, a region of high-quality habitat currently excluded from coverage. Blue lines show proposed boundaries of SEA

The decision to omit this area from the SEA is puzzling, especially because it exhibits features consistent with the rest of the SEA, and even supports species that are extremely localized and declining region-wide, which are presumably of great conservation concern.

Though the wording of the Los Angeles County General Plan update regarding SEAs is vague ("Conservation and Open Space" section, p. 118), a more detailed definition was provided by PCR (2000), listing six main criteria, of which the Puente Hills met four.

The criteria which it met are also satisfied by the inclusion of the omitted Aera project site, namely:

- Biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution (both a, regional and b, county-wide).

- Habitat that at some point in the life cycle of a species or group of species, serves as concentrated breeding, feeding, resting or migrating grounds and is limited in availability.
- Areas that would provide for preservation of relatively undisturbed examples of the original natural biotic communities of Los Angeles.

The breeding bird species of the Puente-Chino Hills were treated by Cooper (2000), who identified three key areas most important for bird conservation in the range; two of these are located in the southwestern Aera region, *including in the portion excluded by the current boundaries*. These include the extensive grassland between Harbor Blvd. and State Route 57, and the coastal sage scrub of north Brea/west Yorba Linda.

The extensive grassland of the Aera site is unique in the Puente Hills; no other comparably large grassland remains in the Los Angeles Basin. Therefore, it is extremely important for grassland obligate species such as White-tailed Kite, Grasshopper Sparrow, and others. Despite the admixture of non-native grasses in the system, this habitat is very robust, and supports countless patches of native species, even where grazed.

The coastal sage scrub along the southeastern corner of the Aera site is an extension of what is arguably the highest-quality stand of this habitat in the entire Puente-Chino Hills, that along the northern border of the City of Brea (Orange Co.). This habitat, which also includes extensive Cactus Scrub, was found to support a robust population of the Federally-threatened California Gnatcatcher, among many other sensitive species (see below).

Southern California black walnut woodland, considered a sensitive natural community and wholly restricted to the hills surrounding the Los Angeles Basin, is probably best developed in the eastern Puente Hills (LSA 2007), including the Aera property. Prior to grazing, this habitat was probably more extensive in the "missing" Aera piece.

In a review of the status of sensitive nesting bird species of the hills (Cooper 2000:230-232) identified 18 species considered regionally-declining and at high risk of local extinction along the Puente-Chino Hills Corridor. Most of these are found within this Aera portion of the hills, including some that reach their maximum abundance in Los Angeles County here.

Notable among these are the following species:

**Northern red diamond rattlesnake *Crotalus ruber ruber***  
**California Reptile Species of Special Concern**

This animal reaches the northern global extent of its range in south-facing slopes of the Whittier Hills (Haas et al. 2002), and the Aera site presumably supports this taxon, as it occurs just to the east above Yorba Linda (pers. obs.).

**White-tailed Kite *Elanus leucurus***  
**California Bird Species of Special Concern**

Kites, presumably breeding locally, were a common site during spring/summer surveys in this area in the late 1990s; this species is effectively at the northern edge of its range in the Puente-Chino Hills in the Harbor Blvd. area, with perhaps a single pair to the west (in Powder Cyn.).

**Golden Eagle *Aquila chrysaetos***

**California Bird Species of Special Concern**

The only Golden Eagles observed perched in the Puente-Chino Hills during breeding surveys in 1997-98 were an adult and a juvenile observed in the Aera site, just off the eastern border of the omitted piece. These birds were detected on 24 May 1997, and presumably were the same birds that have been documented nesting near Chino Hills State Park to the east.

**Loggerhead Shrike *Lanius ludovicianus***

**California Bird Species of Special Concern**

The Aera property may represent the last hope for breeding shrikes in the Los Angeles Basin; a recent survey (2005) conducted by the Los Angeles Co. Museum of Natural History (which did not include the Puente Hills) found no breeding pairs, yet two were on the Aera property on 31 May 1997 (Cooper, unpubl. data), suggesting breeding at least then. The habitat - rolling hills with grassland - is ideal for this species.

**California Gnatcatcher *Polioptila californica californica***

**Federally Threatened**

The largest population of this taxon in the Puente-Chino Hills is in the band of scrub from just east of Harbor Blvd. (incl. the Aera site missing from the proposed SEA), east into Yorba Linda in Orange Co. (visible in gray-green at the lower left of Fig. 3). Several dozen acres of this habitat appears to have been left out of the SEA. This population is presumably the source population for subpopulations farther west along the hills, including several pairs along Arroyo San Miguel (vic. Colima Rd.). Further degradation of the open space between these two groups could have detrimental effects on both populations.

**Southern California Rufous-crowned Sparrow *Aimophila ruficeps canescens***

**California Bird Species of Special Concern**

Very common throughout site (and throughout hills).

**Bell's Sage Sparrow *Amphispiza belli belli***

**California Bird Species of Special Concern**

This California-Baja endemic is known in the Puente Hills only from a single (juvenile) individual observed along the eastern edge of the missing Aera corner on 24 May 1997 (Cooper, unpubl. data). This species is strongly tied to undisturbed coastal sage scrub and Chamise chaparral in our area, and, like the Loggerhead Shrike, may be extremely dependent upon this habitat on the Aera site for its persistence in the Los Angeles area. The nearest Los Angeles County populations are vic. Claremont, along the foothills of the San Gabriel Mtns. (possibly extirpated) and at Castro Peak in the western Santa Monica Mtns.

**Western Grasshopper Sparrow *Ammodramus savannarum perpallidus* California Bird Species of Special Concern**

Known from just a handful of areas in the Puente Hills, this range is arguably the most important site for this species in Los Angeles County. The largest population in the hills by far is located in the grassland between Harbor Blvd. and the 57 Fwy. (20+ birds in 1997, D. Cooper unpubl. data). They would be expected to occur in grassland on the southwestern corner as well. Just west of here, a breeding colony of this species was also present (<5 pr.) in the southeastern portion of Powder Canyon along the Schabarum Trail, and on a grassy ridge just south of Turnbull Canyon. (Skyline Trail).

A major study (Resource Management Plan, Puente Hills Landfill Native Habitat Authority, LSA and Associates 2007) compiled much of the pertinent information on the sensitive wildlife and plants of the Puente Hills within the Habitat Authority's jurisdiction. Notably absent from the proposed boundaries of the SEA is the entire extent of "Core habitat" which was delineated by the Habitat Authority within its Resource Management Plan located west of Colima Rd. This large parcel, now managed by the Habitat Authority, is contiguous to habitat known to support some of the most imperiled species of the Puente Hills, including the federally-threatened California Gnatcatcher and such California species of special concern as coastal populations of the Cactus Wren *Campylorhynchus brunneicapillus*, the latter having suffered widespread extirpations in recent years. These areas should be included within the SEA.

Also, please consider for inclusion other biologically rich lands owned or managed by the Habitat Authority at the top of the Turnbull Canyon watershed. There are several other parcels adjacent to Habitat Authority properties in this area than warrant inclusion into the SEA due to habitat importance (Figure 4). This is an area that was found to support several rare plants, including Plummer's Mariposa-Lily *Calochortus plummerae* and the western spadefoot *Spea hammondi* (described in the RMP). However, the proposed SEA would actually reduce the coverage of this important upper watershed zone. In this case, we recommend that at the least, the existing SEA boundary remain in place.

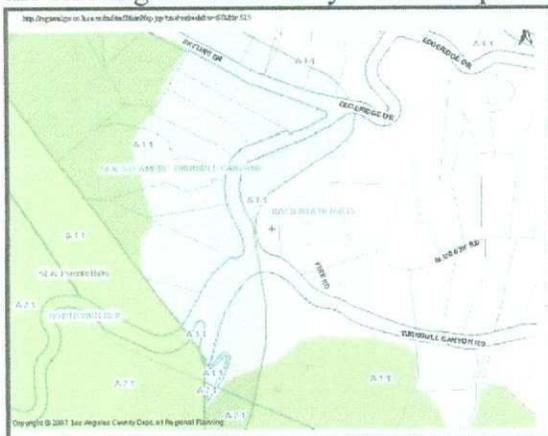


Figure 4. Hacienda Heights Area, showing pale green shaded area formerly included in the Puente Hills SEA.

While in general, the Habitat Authority welcomes the SEA designation over its properties, please consider deletion of the developed area of Sycamore Canyon from the proposed SEA designation. The Habitat Authority is considering installing a small office in between two

existing buildings at this location where there would no impacts to the native landscape or environment. This physical presence would enable us to better manage this and other sensitive habitat areas in the western Puente Hills.

Habitat Authority would welcome the opportunity to meet with County staff to discuss any of these matters in further detail.

**Proposed Puente Hills SEA Description:**

In addition, please note the following changes to the current description for the Puente Hills SEA.

On Page 1 of the Puente Hills Description– Paragraph 4- Please note that there are key regional habitats represented in the Puente Hills such as southern California black walnut woodland.

Page 2, Paragraph 1- Oak woodland is prevalent in the Hacienda Hills as well.

Paragraph 2 - Oak Riparian woodland is not extensive in Powder Canyon. Powder Canyon is a mostly arid drainage that does not have the riparian elements of many other drainages in the hills. The classic oak-willow-sycamore canopy and the dense, herbaceous understory typical of this habitat is absent from most of Powder Canyon.

Paragraph 4 – Please reevaluate the description of willow scrub. It is our understanding that willow scrub has dense understory, composed of Mulefat and Sandbar Willow *Salix exigua*.

Paragraph 5 – Please replace the word "robust" with "high in stature," "high, evergreen" or something else - most habitats have robust species, even non-native grassland.

The western limit of "mixed chaparral" in the Puente Hills extends to about Powder Canyon, and is dominated by the species listed, as well as by Scrub Oak (*Q. berberidifolia*), with subdominants of Chamise, *Cercocarpus*, and *Ceanothus*; Laurel Sumac is uncommon. The chaparral-like habitat prevalent west of Powder Canyon is better termed "sumac scrub", and is dominated by the species listed in the paragraph 5 of page 2; Laurel Sumac, for example, is common and dominant in sumac scrub

Page 2, Paragraph 5 (continued on page 3) - Mixed Chaparral is widespread in the eastern Puente Hills, and Sumac Scrub is widespread in the western Puente Hills - I would not single out individual drainages (Sycamore Canyon, etc.) here.

Page 3, Paragraph 1 - Coastal sage scrub is very robust. Maybe write "short in stature" to distinguish it from chaparral. Please note that cactus scrub forms a very important subunit of coastal sage scrub, and is extensive on southerly and westerly slopes, including Sycamore Canyon, Hellman Park, and the entire La Habra Heights area. These patches represent some of the best examples of cactus scrub in the entire county, and should be noted as such.

Paragraph 2 - Non-native grassland is extensive in three important areas of the Puente Hills; along the Skyline Trail south of Turnbull Canyon, vic. Powder Canyon, and south of Rowland

Heights ("Aera" property). This habitat supports a variety of sensitive plant and animal species (e.g., Catalina Mariposa-Lily *Calochortus catalinae*, Grasshopper Sparrow, Western Spadefoot), and is not degraded as portrayed here.

Paragraph 3 - Freshwater marsh is restricted to the San Bernardino County portion of upper Tonner Canyon, both north and south of Grand Ave. (easily visible from road); no actual freshwater marsh habitat exists within this SEA in Los Angeles Co., though there is substantial freshwater marsh to the west, within Whittier Narrows.

Paragraph 5 - Invertebrates were investigated by LSA (2005), who documented several scarce butterflies, including California Dogface *Colias eurydice*, Western Tailed-Blue *Everes amyntula*, and Mormon *Apodemia mormo* and Fatal *Calephelis nemesis* Metalmarks. These are scattered throughout the hills.

The herpetofauna of this SEA was investigated by Haas et al. (2002) and LSA (2005), who found the hills to support several locally-rare and/or sensitive species, including Western Spadefoot (one recent record vic. Skyline Trail south of Hacienda Hts.), Arboreal Salamander *Aneides lugubris* (Whittier Hills, Powder Cyn.), two species of slender-salamander (*B. nigriventris* and *B. major*; widespread), Coastal Western Whiptail *Cnemidophorus tigris* (widespread), Red Diamondback Rattlesnake *Crotalus ruber* (localized), and Western Blind Snake *Leptotyphlops humilis* (Powder Cyn.).

Page 4, Paragraph 1 - Sensitive mammals (LSA 2005) include the Desert Woodrat *Neotoma lepida* and habitat specialists like the Cactus Mouse *Peromyscus eremicus* (Whittier Hills) and the Western Gray Squirrel *Sciurus griseus* (Powder Cyn.).

The Puente Hills is extremely important for bats, and 11 species were documented here during a recent study (Remington 2006), including such sensitive species as Yuma myotis *Myotis ymanensis*, western red bat *Lasiurus blossevillii*, western yellow bat *Lasiurus xanthinus*, hoary bat *Lasiurus cinereus*, pallid bat *Antrozous pallidus*, pocketed free-tailed bat *Nyctinomops femorosaccus* and western mastiff bat *Eumops perotis*.

Page 4 – Paragraph 2 –The Mountains Recreation and Conservation Authority (a joint powers of the Santa Monica Mountains Conservancy) working with the Wildlife Corridor Conservation Authority commissioned the study of wildlife movement in Puente Hills.

Page 5 - A major study (LSA 2007) compiled much of the pertinent information on the sensitive wildlife and plants of the Puente Hills within the Habitat Authority's jurisdiction. The federally Threatened California Gnatcatcher occurs in at least two areas of the hills, vic. Arroyo San Miguel east of Colima Dr. and a smaller, possibly irregular population along Sycamore Canyon in the western Puente Hills. These represent some of the last locales for this bird in the Los Angeles Basin, and some of the farthest-north individuals of the species.

This range is notable as holding among the last known populations in the Los Angeles area for several taxa that are considered California Species of Special Concern and/or that are nearly extinct locally, and through recent biological monitoring, we are discovering additional

protected species every year, including the federally Endangered Least Bell's Vireo, detected in 2005 and 2007 and possibly rare summer resident. It is not a coincidence that many of these species are grassland or coastal scrub specialists; these habitats have been virtually eliminated in the Los Angeles Basin, but persists in a reasonably intact state in the Puente-Chino Hills (Cooper 2000).

**Proposed SEA Ordinance:**

From time to time the Habitat Authority will propose improvements to the open space such as low impact recreational trailheads, trails, wildlife road underpasses, or fences to limit illegal off-road activity on protected preserve areas. Our intentions with these and similar projects are to design them around the existing biological resources to ensure the resources will continue to function and even flourish. We recommend that open space management activities of this nature be considered as compatible and appropriate within a SEA. More specifically, we recommend that language be added into the SEA Ordinance allowing public land preservation agencies with adopted management plans to carry out all activities that contribute the mission of their agency.

**Circulation:**

In regards to Figure 4.6, Adopted and Proposed Scenic Corridors, we support the existing candidacy of Colima Rd., Hacienda Rd., Harbor Blvd., and the 57 Freeway as scenic corridors. In addition, we support adding Turnbull Canyon Rd., as a proposed scenic corridor.

**Conservation & Open Space Element:**

We commend the County for its efforts in protecting the last remaining open space areas in the Los Angeles Basin. In regards to Figure 5.1, Open Space, we will support the inclusion of the unincorporated Authority owned/managed lands to be designated as Other Park and Conservancy Land. Currently some of the unincorporated properties we own/manage are indicated as such, but not all of them. Please contact the Habitat Authority staff for a map of Habitat Authority owned/managed lands in GIS at your convenience.

In regards to Figure 5.2, Trail Network, missing is the existing Los Angeles County Schabarum Trail through the Puente Hills. Please include this trail and its connector trails, as well as adopted trails of the Habitat Authority which can be designated as Existing Official Trails on Public Lands Trail Network. Please contact the Habitat Authority staff for a map of these trails in GIS at your convenience.

In regards to the Biological Resources: Urban-Wildland Interface (page 123), we recommend that its definition include the following italicized language "...where the edge of the forest *and other publicly owned open space* lands meet development..." The Habitat Authority's adopted Resource Management Plan addresses urban edge issues, and we also have produced a DVD regarding urban edge issues, both intended to protect the Puente Hills' biotic, watershed, aesthetic and recreational resources. Edge issues are not unique to the forest.

**Safety:**

On page 164, please add to Goal S-2: Coordination with other public agency emergency planning and response activities.

Furthermore, the General Plan should address the issue of compatibility of roadways with wildlife in the Circulation and Conservation and Open Space Elements, not exclusively in the section dealing with Significant Ecological Areas. Issues to address include the restriction of wildlife movement, the increase in wildlife mortality with roadways, and the threat of public safety with vehicular-wildlife collisions. The draft General Plan should include measures such as wildlife underpasses, overpasses, fencing, or signage to address these conditions during the continued operation of existing roadways, for new roadway development, and for other development that would significantly increase traffic on roadways, near natural and wildland areas.

Please add us to the mailing list for the draft General Plan and all associated documents when they are made available for public review. Thank you for your consideration of our comments. Again, we would like to meet with County staff to further discuss these issues at your convenience. Feel free to contact me or Andrea Gullo, Executive Director, at (562) 945-9003 for further discussion.

Sincerely,



Bob Henderson  
Chairman

cc: Board of Directors  
Citizens Technical Advisory Committee

Sources Cited:

Cooper, D.S. 2000. Breeding landbirds of a highly-threatened open space: The Puente-Chino Hills, California. *Western Birds* 31(4):213-234.

Haas, C.D., A.R. Backlin, C. Rochester, and R.N. Fisher. 2002. Monitoring reptiles and amphibians at longterm biodiversity monitoring stations: The Puente-Chino Hills. USGS Western Ecology Research Center. Final report. Sacramento, California.

LSA Associates, Inc. 2005. Dragonfly, Butterfly, and Vertebrate Species Matrix for the Puente Hills Landfill Native Habitat Preservation Authority Lands, Results of Multispecies Surveys and Pitfall Trapping, Irvine, California.

LSA Associates, Inc. 2007. (Draft) resource management plan. Puente Hills Landfill Native Habitat Preservation Authority. (May 2007) July 2007. Irvine, California.

PCR Services Corporation (with Frank Hovore & Associates and FORMA Systems). 2000. Biological resources assessment of the proposed Puente Hills Significant Ecological Area. November 2000. Irvine, California.

Remington, S. 2006. Bat surveys of the Puente Hills. Final report. Costa Mesa, California. July 2006.

**SANTA MONICA MOUNTAINS CONSERVANCY**

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MALIBU, CALIFORNIA 90265  
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SEP - 6 2011

August 30, 2011

Ms. Connie Chung, AICP  
Supervising Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1356  
Los Angeles, California 90012

Ms. Thuy Hua, AICP  
Senior Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1356  
Los Angeles, California 90012 1354

**Notice of Preparation of a Draft Environmental Impact Report  
Los Angeles County General Plan and Antelope Valley Area Plan Updates**

Dear Mses. Chung and Hua:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed both the Los Angeles County Draft General Plan and the Draft Antelope Valley Area Plan. We appreciate the ongoing working relationship with your staff as you write the policies that will guide growth in Los Angeles County for the next generation.

Please find attached two comment letters for inclusion in the scoping for the Draft Environmental Impact Reports for the respective plans. The most recent letter for the Draft General Plan was sent to your department on June 27, 2011 and included previous letters on the subject as attachments. A new letter dated August 29, 2011 on the Antelope Valley Area Plan update is also attached. The Conservancy had not yet received the Notice of Preparation before drafting this letter. We request that all of these referenced materials be included in scoping.

If you have any questions, I can be reached at (310) 589-3200, ext. 128.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Edelman", written over a horizontal line.

PAUL EDELMAN  
Deputy Director  
Natural Resources and Planning



**SANTA MONICA MOUNTAINS CONSERVANCY**

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June 27, 2011

Ms. Julie Lowry, Principal Planner  
General Plan Development Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Supplemental Comments on Los Angeles County Draft 2035 General Plan**

Dear Ms. Lowry:

The Santa Monica Mountains Conservancy (Conservancy) appreciates the opportunity to comment on the Draft 2035 General Plan. In addition to our previous comments, dated May 23, 2011, the Conservancy offers the following comments. It is our hope that the proposed changes contained herein can be made to the draft plan prior to the issuance of the Notice of Preparation such that they are included in the environmental review process.

**Requested Revisions to Significant Ecological Area Boundaries**

Since our May 23, 2011 letter, the Conservancy has identified specific requested additions to the County's proposed Significant Ecological Areas (SEAs). The attached additions are refined versions of previous Conservancy requests. All of these requested additions are substantially similar to and contiguous with the habitat contained within the County's proposed SEAs. The Conservancy sees no justification for exclusion of these habitat areas from SEA designation when they are ecologically interrelated and biologically similar to the County's designations. Each requested addition is discussed in detail below.

**Proposed Newhall Wedge Addition to Santa Susana Mountains/Simi Hills SEA**

The Conservancy requests a northerly expansion of the proposed SEA designation north of the I-5 in the "Newhall Wedge". The requested addition would extend northerly along I-5 to Calgrove Boulevard, then easterly along the edge of current development to Pine Street, as depicted in the attachment. An additional portion would extend easterly from Pine Street along the Eternal Valley Fire Road, then southerly along the ridgeline to the County's proposed SEA boundary. The expansion would include the area between I-5 and The Old Road, which contains a rich California Walnut Woodland community and Mountains Recreation and Conservation Authority (MRCA) parkland.

This expanded area includes two blue line streams home to Southern Coast Live Oak Riparian Forest and known occurrences of California orcutt grass (*Orcuttia californica*), a state- and federal-listed species. Additional rare or threatened species occurrences in the expanded area include slender mariposa lily (*Calochortus clavatus var. gracilis*) and Palmer's grapplinghook (*Harpagonella palmeri*). The California Walnut Woodland in the southwestern portion of the expanded area is part of the known range for western mastiff bat (*Eumops perotis californicus*).<sup>1</sup>

Most importantly, the expanded area forms part of the Newhall Wedge habitat block and facilitates critical regional wildlife movement. Due to existing constrained conditions, the Newhall Wedge habitat block must be of sufficient size to support a viable home range for medium-sized mammals in order to continue its present role in regional connectivity. The expanded area would ensure that existing conditions do not deteriorate further.

The County's proposed SEA is deficient for not including approaches to two freeway undercrossings within the designated area. Both The Old Road and Calgrove Boulevard undercrossings are essential for maintaining regional habitat connectivity—the primary purpose of designating this SEA. The Old Road undercrossing is rated the highest quality of all I-5 crossing points in the Newhall Wedge. The crossing is open, with ample tree cover on both east and west approaches. To effectively protect wildlife movement, the SEA must include all approaches to this undercrossing. Topographical constraints require protection of the entire ridge to ensure access from the north. The woodland area on both sides of The Old Road must likewise be included.

The area's known rare resources and critical importance in regional wildlife connectivity warrant its inclusion in the Santa Susana Mountains/Simi Hills SEA.

#### **Proposed Mormon Canyon Addition to Santa Susana Mountains/Simi Hills SEA**

The Conservancy also requests an addition to the Santa Susana Mountains/Simi Hills SEA that includes Mormon Canyon on the southern flank of Oat Mountain. The proposed expansion is ecologically unified with the adjacent Browns Canyon, much of which is protected by the MRCA. Like Browns Canyon most of Mormon Canyon consists of Southern Mixed Riparian Forest, providing a critical water source and cover on an

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<sup>1</sup>Department of Fish and Game. *California Natural Diversity Database*.

otherwise arid south-facing slope. As a tributary of Browns Canyon, any disturbance in the upper Mormon Canyon watershed will affect downstream resources within the County's proposed SEA. The Conservancy used watershed boundaries as the basis for the proposed SEA expansion, which is shown in the attachment.

Mormon Canyon is a critical piece of the Oat Mountain habitat block. The woodland habitat in upper Mormon Canyon is actually superior to Browns Canyon and in closer proximity to California Walnut Woodland and Valley Oak Woodland on the other side of the ridge. The lushness of the vegetation in upper Mormon Canyon suggests the presence of a spring and provides ample cover for southwest-northeast wildlife movement. Due to its ecological similarity with Browns Canyon, a biological survey would likely identify occurrences of the same rare or threatened species, including two-striped garter snake (*Thamnophis hammondi*), coast horned lizard (*Phrynosoma blainvillii*), and Plummer's mariposa lily (*Calochortus plummerae*).

#### **Proposed Valley Oaks Savannah-Santa Susana Mountains/Simi Hills SEA Connection**

The current extent of the proposed Valley Oaks Savannah SEA does not follow the County's own imperatives for SEA selection and design. The County's previous experience shows that small, isolated SEAs do not adequately protect significant resources. As explained in the County's Conservation and Open Space Element Resources, the design of the current 1980 SEAs is deficient due to the creation of habitat "islands" surrounded by soon-to-be-urbanized land:

Because some of the "island" habitats were isolated from each other by development within the intervening areas, the opportunity for species movement and genetic dissemination was dramatically reduced. Therefore, the identification of island habitats, independent of the entire ecosystem, was ultimately deemed to be unsustainable.<sup>2</sup>

Despite this previous experience, the County's proposed Valley Oaks Savannah SEA is precisely that: a habitat "island". To address this deficiency, the Conservancy proposes an expansion of the Santa Susana Mountains/Simi Hills SEA that connects directly with the Valley Oaks Savannah SEA. As shown in the attachment, the requested addition would

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<sup>2</sup>Appendix E: Conservation and Open Space Element Resources. *Draft 2035 General Plan 56*

extend from public parkland in Pico and Potrero Canyons around built-out Stevenson Ranch to reach the Valley Oaks. Without this habitat connection, terrestrial mammals would be unable to access the isolated block. As a result, the Valley Oaks would not support a healthy predator population and the ecosystem would be unsustainable in the long term. Furthermore, adaptation to climate change would be precluded by the genetic barrier and physical constraint on species home range evolution.

### **Requested Amendments to County Highway Plan**

During the One Valley One Vision planning effort in the Santa Clarita Valley, the Conservancy requested specific amendments to the highway plan to reduce impacts to biological resources. Should it be impossible to make these changes through that planning vehicle, the Conservancy requests that the following proposed rural widenings or extensions be removed from the General Plan Mobility Element:

- Agua Dulce Canyon Road
- Davenport Road
- Escondido Canyon Road
- Bouquet Canyon Road north of Copper Hill Drive
- The Old Road south of Calgrove Boulevard
- Placerita Canyon Road
- Shadow Pines Boulevard/Tick Canyon Road (proposed extension)
- Sierra Highway north of Vasquez Canyon Road
- Pico Canyon Road

The Conservancy contends that each of the above projects would have a significant avoidable impact on wildlife movement by increasing wildlife mortality, discouraging crossings, and decreasing genetic exchange. In their comments on the One Valley One Vision Plan, the California Department of Fish and Game independently arrived at the same conclusion.

The science is quite clear in this respect: vehicle collisions are the leading direct human-caused sources of bobcat and mountain lion mortality in Southern California. Wider roads increase mortality and decrease the frequency of successful crossings until a threshold width is reached where crossings are no longer attempted (i.e. across freeways). A study in New

Mexico directly documented these effects on mountain lion populations.<sup>3</sup> Widening roads leads to faster vehicle speeds and larger traffic volumes, both of which are factors in vehicle-wildlife collision rates. Even the width of the pavement has a negative effect on mountain lion dispersal. Local research by the National Parks Service and others have observed frustrated dispersals among tracked carnivores and documented the resulting significant genetic differences across movement barriers.

The Conservancy believes that widening these roads is bad policy. The only possible justification for doubling road capacity within these rural areas is to promote further residential development in remote areas—in direct opposition to the stated goals of the current planning effort. The circulation models appear to assume traffic volume increases only possible if housing continues to sprawl into rural-zoned areas, leading to the misguided recommendation to increase capacity. Even worse, the extension of Shadow Pines Boulevard/Tick Canyon Road all the way to Davenport Road would divide a Significant Ecological Area and provide access to otherwise remote parcels, thereby inducing growth. The County and others are actively promoting protection of these resources through the Angeles Linkage Conceptual Area Protection Plan, so it is unclear why the general plan would then propose fragmenting the same habitat area.

Due to the cumulative nature of the impacts, these issues are best addressed at the plan level. While any one widening could feasibly be mitigated, a succession of mitigated road widenings would still decrease overall landscape-level permeability. The Conservancy therefore requests that these impacts be avoided entirely or comprehensively mitigated at the plan level with appropriate policies and programs, including construction of crossing structures and acquisition of adjacent habitat.

#### **Requested Inclusion of Transfer of Development Rights Program**

In discussion with County staff, the Conservancy raised the idea of implementing a countywide Transfer of Development Rights (TDR) program. Such a program would relieve development pressure on sensitive rural areas and facilitate smart growth in urban centers, particularly in connection with transit-oriented developments. It is our understanding that such a program has been included in the Draft 2035 General Plan. The Conservancy is in

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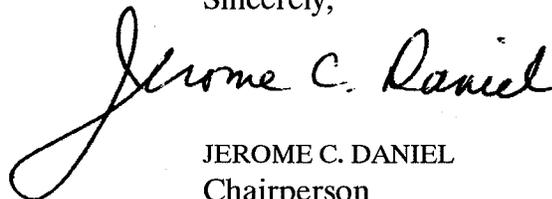
<sup>3</sup>Sweanor, L. L., K. A. Logan, and M. G. Hornocker. 2000. Cougar dispersal patterns, metapopulation dynamics, and conservation. *Conservation Biology* 14:798-808.)

Ms. Julie Lowry, General Plan Development Section  
Supplemental Comments on Los Angeles County Draft 2035 General Plan  
June 27, 2011  
Page 6

full support of the proposed TDR program and looks forward to collaborating with County staff on its design and implementation. For your reference, we have attached the outlines of the proposed program as described by County staff. Specifically, we recommend explicitly including the City of Santa Clarita in the General Plan language to facilitate the program's implementation in the northern portion of the County.

Thank you for your consideration of these comments. The Conservancy appreciates the ongoing collaboration with your staff as this process moves forward. We hope that these requested revisions, additions, and deletions can be accomplished prior to commencement of the Draft Environmental Impact Report such that they can be fully vetted during environmental review. If you have any questions, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128.

Sincerely,

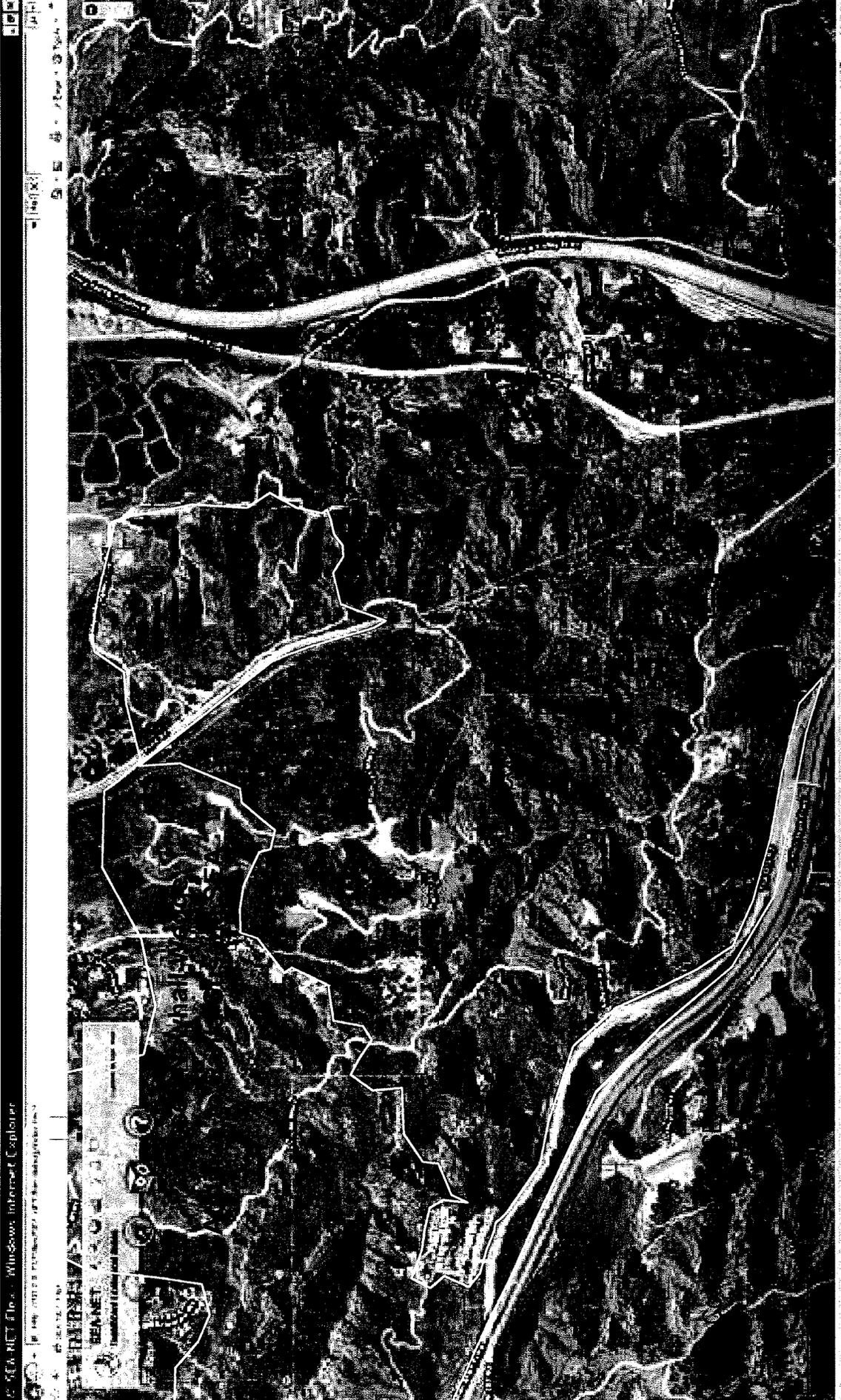
A handwritten signature in cursive script that reads "Jerome C. Daniel". The signature is written in black ink and is positioned above the printed name and title.

JEROME C. DANIEL  
Chairperson

Attachments

Agenda Item 15  
SMMC 6/27/11  
Attachment





Extend to Calgrove Undercrossing

Microsoft File - Windows Internet Explorer

http://www.mpa.gov.au/.../...

Map navigation controls: Home, Back, Forward, Stop, Refresh, Print, Full Screen, Close

Map scale: 1:50,000

Map title: BENNETT

Map coordinates: 145° 30' E, 37° 30' S

Map data source: Department of Transport

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Map scale bar: 0, 100, 200, 300, 400, 500 meters

Map north arrow

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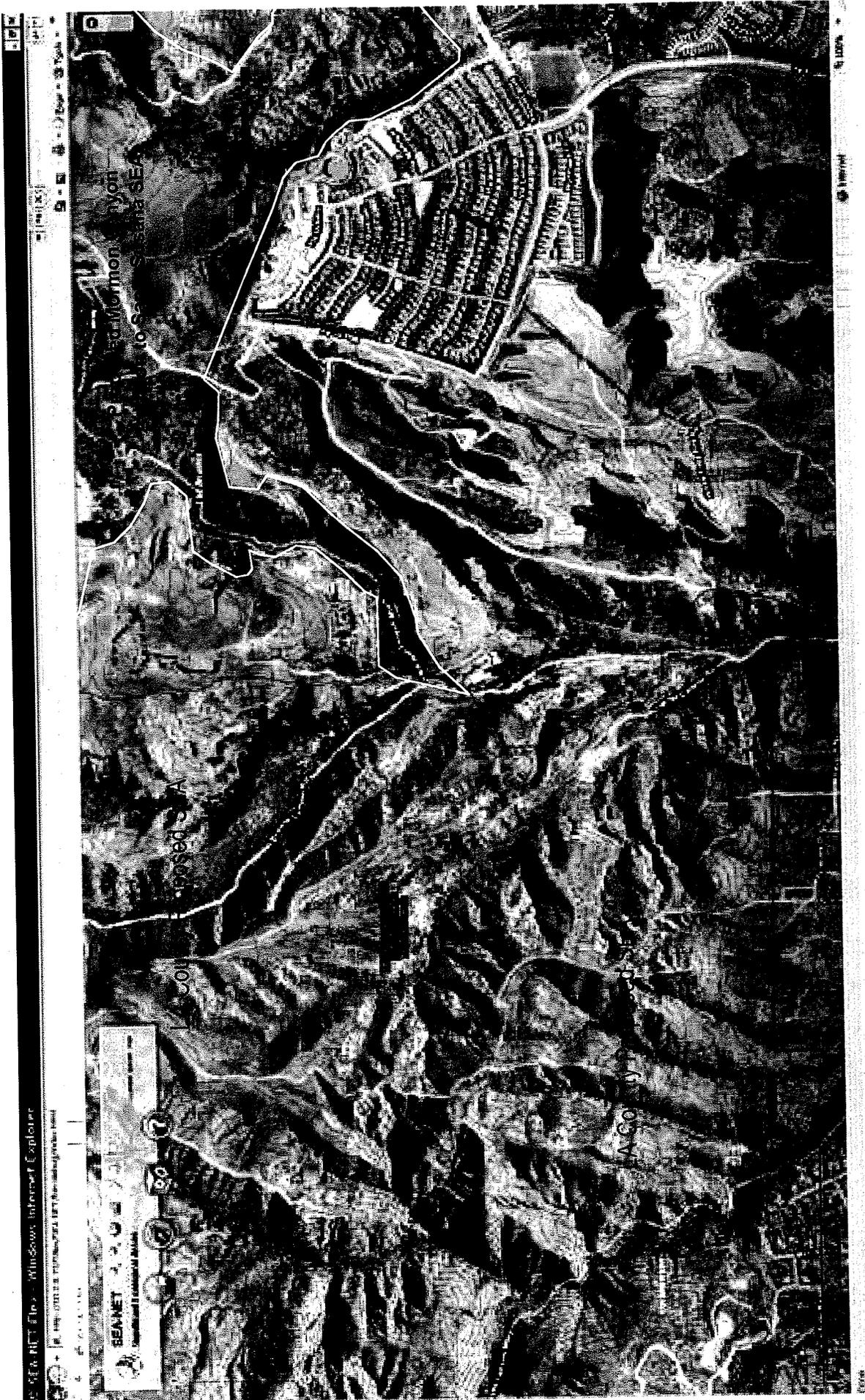
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**From:** [Glaser, Mitch](#)  
**To:** [Eric Bruins](#); [Paul Edelman](#)  
**Cc:** [Jason Smisko](#); [Chung, Connie](#)  
**Subject:** TDR Program  
**Date:** Tuesday, June 14, 2011 9:35:02 AM

**Agenda Item 15**  
**SMMC 6/27/11**  
**Attachment**

Good Morning Eric and Paul:

On May 17, the Santa Monica Mountains Conservancy (SMMC) sent a letter to the Santa Clarita City Planning Commission regarding the City's General Plan Update. The City's General Plan Update is a component of "One Valley One Vision" (OVOV), which is a joint effort between the City and Los Angeles County. The other component is the County's Santa Clarita Valley Area Plan Update.

The SMMC letter stated, in part, "The Conservancy therefore recommends that the City include an additional policy that directs staff to work with the County to establish an inter-jurisdictional development rights transfer program wherein development rights from all rural-zoned parcels are eligible for transfer to urban-zoned areas, subject to reasonable conditions. Such a program could even provide a bonus for transferring rights from rural parcels within a SEA to leverage the benefits of such a program."

As you may be aware, the County is also in the process of updating its Countywide General Plan. A draft was released in April and may be found at the following Web Site:  
<http://planning.lacounty.gov/generalplan>

The Draft Countywide General Plan Update must undergo an environmental review (EIR) prior to public hearings. A Notice of Preparation for the EIR will be released shortly and we anticipate that the EIR will be released in early 2012. Public hearings before the County's Regional Planning Commission and Board of Supervisors will occur after the EIR is released and we anticipate that the Countywide General Plan Update will be adopted by the end of 2012.

The Draft Countywide General Plan Update includes a Transfer of Development Rights (TDR) implementation program, which I have copied below. The "Phase 2" timeframe means 3-5 years after adoption:

			Timeframe			
Implementation Program	Actions	General Plan Policies	Phase 1	Phase 2	Phase 3	Ongoing
<b>Transfer of Development Rights Program</b>	Explore the feasibility of a Transfer of Development Rights (TDR) Program in order to direct growth and development away from valuable open space areas to identified infill areas.	Land Use Element: Goals LU 3, LU 4		X		

	<ul style="list-style-type: none"> <li>· Identify open space, rural and agricultural areas, including Agricultural Resource Areas (ARA) and Significant Ecological Areas (SEAs), under development pressure as sending areas. Identify potential receiving areas, such as TODs and vacant and underutilized sites, in urban areas</li> <li>· Prepare an ordinance that outlines applicability and procedures for the TDR Program.</li> <li>· Establish County entity to coordinate the sales and transactions of TDR.</li> </ul>					
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I feel that this TDR implementation program is in line with what the SMMC would like to see in the Santa Clarita Valley.

Given the large number of cities in the County, it would be practically impossible for the County to pursue an inter-jurisdictional TDR program with all of them. However, it is possible for the County to work with the City of Santa Clarita on this program, and it makes sense when you consider that the City is completely surrounded by County territory (unlike any other City in the County) and that the City and County are already committed to joint planning, as evidenced by the OVOV effort.

We could add another bullet point to the description of the program that would indicate that we will work with the City of Santa Clarita. The bullet point would be something to the effect of "Include the City of Santa Clarita in the TDR program in order to continue the joint planning efforts initiated by the One Valley One Vision program." Given the technical and legal challenges, we can't guarantee that we'll ultimately have an inter-jurisdictional program with the City, but this implementation program would commit the City to exploring the feasibility with us and working with us on our ordinance and (potentially) a companion ordinance in the City's Unified Development Code.

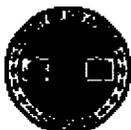
I have conferred with Jason Smisko, my counterpart at the City of Santa Clarita, and he indicated that the City is willing to participate in this program. He will acknowledge this during his presentation to the Santa Clarita City Council. I have also conferred with Connie Chung, my colleague who is responsible for the Countywide General Plan Update, and she is also willing to pursue this. I anticipate that the Draft Countywide General Plan Update will be amended accordingly.

I hope that this addition will fulfill SMMC's recommendation. If you have any questions or concerns, please feel free to contact me. As previously discussed, I will set up a meeting with the SMMC in the

near future to discuss the County's Santa Clarita Valley Area Plan Update and SMMC's concerns in that regard. The meeting will also provide an opportunity to discuss the Countywide General Plan Update and the County's Antelope Valley Area Plan Update, which is also in progress and will be adopted concurrently with the Countywide General Plan Update.

Thanks,  
Mitch

Mitch Glaser, AICP  
Supervising Regional Planner  
Community Studies North Section  
Department of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012  
<http://planning.lacounty.gov>  
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May 23, 2011

Gretchen Siemers, Planner, AICP  
Housing Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Comments on Los Angeles County Draft 2035 General Plan**

Dear Ms. Siemers:

The Santa Monica Mountains Conservancy (Conservancy) offers the following initial comments on the Draft 2035 General Plan. We anticipate providing additional comments on the Plan later. From 2001 to 2008, the Conservancy has submitted five comment letters on the General Plan, Significant Ecological Areas (SEAs) and SEA Update Study, SEA Proposed Regulatory Changes, and Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Comprehensive Update and Amendment to the Los Angeles County General Plan.

In this current letter, we emphasize several key comments. It is our understanding that an Environmental Impact Report (EIR) will be prepared by the County for the Draft 2035 General Plan. We understand the County will soon release a new NOP for the Draft General Plan. The General Plan and EIR will be deficient if they do not incorporate the following provisions.

**Significant Ecological Area Boundaries**

In previous comment letters, the Conservancy expressed its support for the more inclusive SEA boundaries (compared with current SEA boundaries) and the Conservancy commended the County on applying this approach. We compliment the County's efforts to propose more inclusive and biologically sound boundaries to ensure the long term ecological sustainability of the SEAs.

The Conservancy's letters, as well those of local agencies, have explicitly defined ecologically justified SEA boundary expansions. Those boundary expansion requests are

each accompanied by a rationale supported by at least one basic principle of conservation biology related to SEA ecological sustainability.

To our knowledge the County has not gone on record with opposing arguments rooted in the principles of conservation biology that justify the exclusion of areas recommend for SEA inclusion by the both the Conservancy and other government entities. The onus is at least equally upon the lead agency to justify the exclusion of such recommended inclusion areas as it is for the recommending agencies to provide detailed studies to justify what are plainly visible macro-landscape level spatial relationships shown on Google Earth aerial photographs. Both the General Plan and its EIR will be more evolved and defensible documents if they include rationale for the exclusion of those SEA expansion areas recommended by government agencies with conservation biology staffs. Likewise such rationale is equally applicable to supporting the inclusion of areas within the County staff's proposed SEA boundary expansion areas.

The EIR must include a feasible alternative with larger SEA boundaries for the SEAs identified in the Conservancy's and other government agencies' previous comment letters (for example, see December 23, 2002 Conservancy letter, enclosed).

#### **Dedications of Land and Conservation Easements**

The Conservancy concurs with many policies and implementation actions in the General Plan including Policy C/OS 1.3, which states:

Create an established network of open space areas that provide regional connectivity, between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to the Puente Chino Hills.

However, the Draft General Plan is lacking in addressing key issues with respect to open space dedications. As indicated in our December 23, 2008 letter (enclosed), an implementation action should be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require permanent open space dedications and protection as part of the development process to mitigate adverse environmental impacts. Open space dedications must be offered to open space park agencies or another entity acceptable to

the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

Furthermore, the General Plan should include a policy or implementation action specifying the timing of any open space dedications. The General Plan should specify that if a conservation easement, conservation easement offer to dedicate (OTD), or fee title dedication is offered in conjunction with County-issued permit or approval, then that conservation easement, OTD, or transfer of deed is required to be recorded prior to the issuance of any permits or recordation of parcel or tract maps. The General Plan should also specify that appropriate entities to accept land transfers or conservation easements include open space park agencies, conservation agencies, or another entity acceptable to the County. Homeowners associations (HOAs) are not appropriate entities to accept such offers, as HOAs sometimes have missions and goals that conflict with the primary purpose of protecting natural land. (Ownership and/or management by HOAs of landscaped or modified areas is appropriate.) The General Plan should also emphasize fee simple dedications and conservation easements over deed restrictions, as they provide the only permanent vehicles for long-term protection of land.

In addition, the General Plan should specify that long-term maintenance funding must accompany any land transfer for the mitigation measure to be complete and sustainable. Open space protection and management requires a permanent funding source that can only be provided by development applicants or the occupiers of their developments. Under all other scenarios the public is shouldered with permanent funding liability. This funding can consist of one of the following options: (1) Community Facilities (Mello-Roos) District, (2) Landscape Maintenance District, or (3) an up front endowment obligation.

### **Trail Dedications**

The General Plan should include a policy or implementation action outlining the conditions under which a trail dedication could be required as part of the development approval process. As we indicated in a previous letter (December 23, 2008, enclosed), an implementation action should be added, which states:

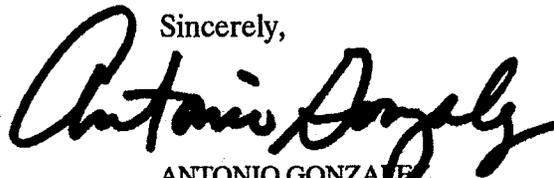
Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require trail easement dedications as part of the development process to mitigate adverse recreational impacts. Trail easement dedications must be offered to open

space park agencies or another entity acceptable to the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

The General Plan should also specify that if a trail easement or trail easement OTD is offered in conjunction with County-issued permit or approval, then that trail easement or OTD must be required to be recorded prior to the issuance of any permits or recordation of the tract map.

Thank you for your consideration of these initial comments. We anticipate submitting additional comments on the Draft 2035 General Plan later. Should you have any questions, please contact Paul Edelman, Deputy Director for Natural Resources and Planning, by phone at (310) 589-3200 ext. 128.

Sincerely,

A handwritten signature in black ink that reads "Antonio Gonzalez". The signature is written in a cursive, flowing style.

ANTONIO GONZALEZ  
Chairperson

Encs. December 23, 2002 letter from Santa Monica Mountains Conservancy to County of Los Angeles, Department of Regional Planning, re: Comments on Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan

December 23, 2008 letter from Santa Monica Mountains Conservancy to County of Los Angeles, Department of Regional Planning, re: Comments on Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008

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December 23, 2008

Mr. Mark Herwick  
County of Los Angeles  
Department of Regional Planning  
General Plan Development Section  
320 West Temple Street  
Los Angeles, California 90012

**Comments on Los Angeles County Draft General Plan:  
Planning Tomorrow's Great Places 2008**

Dear Mr. Herwick:

Santa Monica Mountains Conservancy (Conservancy) staff offers the following comments on Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008. We understand that the County is currently preparing the Draft Environmental Impact Report for the Plan. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

**Open Space Dedications**

Conservancy staff concurs with many of the goals, policies, and implementation actions in the Conservation and Open Space element such as Policy C/OS 2.1, "Develop and expand regional and local parkland in the County," and Implementation Action C/OS 1.1, "Coordinate with Local, State, and Federal park agencies and conservancies to acquire open space for recreation and biotic preservation throughout the County." However, implementation actions should be added at the beginning of the plan's life to encourage or require open space dedications as part of the development process. For example, Implementation Action C/OS 2.2 could be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require permanent open space dedications and protection as part of the development process to mitigate adverse environmental impacts. Open space dedications must be offered to open space park agencies or another entity acceptable to the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

In addition, under the Design Guidelines for Significant Ecological Areas (SEAs; p. 135), we recommend adding the following underlined language:

2. At a minimum, Rretain a contiguous area of undisturbed open space over the most sensitive natural resources to maintain regional connectivity within the undeveloped area, and preserve this area in perpetuity through a recorded fee simple dedication to an open space park agency prior to the issuance of any permits.

We strongly support Policy C/OS 5.7, and we recommend the following underlined language be added:

Require that development mitigate “in-kind” for unavoidable impacts to biologically sensitive areas and permanently preserve mitigation sites, via recorded fee simple dedications or permanent deed restrictions prior to the issuance of any permits.

To acknowledge the role that public conservation agencies have in the acceptance of open space dedications, the following underlined text should be added (p. 124, Section II. Open Space, Parks, and Recreation):

For the purposes of the General Plan, open space dedications are defined as privately owned lands that have been set aside for permanent open space space, or dedicated in fee simple or protected in some other manner by a conservation agency, as part of a larger land development proposal. Commitment of such lands to open space use in perpetuity is typically assured through deed restrictions or dedication of construction rights secured at the time of concurrent with, but not later than, development permit approval, or by protection by a conservation agency.

It is critical when County planners are reviewing development proposals, that they are aware of the locations of not only publicly-owned parks and open space, but also privately-owned land protected by conservation easements or deed restrictions. This is an important tool when planning the locations of developments and where future open space should be set aside. It is preferable that contiguous blocks of open space be protected, rather than ending up with disjointed patches. The following implementation action should be added:

Implementation Action C/OS 2.3. Within six months of approval of the General Plan by the County, create, and update periodically, a GIS layer of protected open space owned by Federal, State, County, or other local agencies or non-profits to assist staff in the project review process and aid applicants in their project design. As the following information becomes available, the layer must include other protected lands, such as conservation easements and permanent open space deed restrictions

### Trail Dedications

Conservancy staff supports many of the trail measures in the General Plan, including Policy C/OS 4.1, "Expand multi-purpose trail networks for all users." As with open space dedications, we suggest that implementation actions be added to encourage or require trail dedications as part of the development process. Implementation Action C/OS 4.2 could be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require trail easement dedications as part of the development process to mitigate adverse recreational impacts. Trail easement dedications must be offered to open space park agencies or another entity acceptable to the County. Guidelines should clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

We support Implementation Action C/OS 4.1, as a GIS layer of proposed trails is a valuable tool for County planners to have when reviewing development applications. Knowing the locations of nearby existing trail easements is also highly valuable in order to successfully site a trail easement on a particular property so that it connects to any trail easements on adjacent properties, or so that it will eventually connect to easements on nearby properties. We recommend that the following underlined language be added:

Within six months of approval of the General Plan by the County, create, and update periodically, a GIS layer of proposed federal, state, county and adjacent city trailways and railway segments, and existing and proposed trail easements and offers to dedicate trail easements, to assist staff in the project review process and aid applicants in their project design. Field verification should be conducted to determine the legitimacy of trail locations.

### SEAs and Biological Protections

We support the County's identification of the linkages, from the South Coast Wildlands Missing Linkages project, on Figure 6.3, Proposed SEAs map. However, depicting the linkages as simple lines is misleading and grossly inadequate. The General Plan must include a figure replicating the precise boundaries of the least cost unions, and potential crossing structures, for the linkages. There is no better science than this study to define the linkages. This work was done at the parcel level (although that parcel data was not publicly released) and the County may wish to obtain the parcel level data from South Coast Wildlands.

We also compliment the County on the inclusion of several important policies to protect SEAs. However, we do recommend some modifications such as adding the following underlined text to Policy C/OS 5.6:

Require that developments within an SEA be designed to meet the Significant Ecological Area Technical Advisory Committee recommendations, to the greatest extent possible, even it that means some substantive diminution of the property's economic value, and to...Preserve wildlife movement corridors; Site roads to avoid sensitive habitat areas or migratory paths;...Provide open or permeable fencing.

Conservancy staff supports the Design Guidelines for a Model Subdivision Project in an SEA (p. 135) to locate development away from wildlife corridors... (5), avoid impermeable fencing outside the development... (6), and direct outdoor lighting downward, away from adjacent open space areas (7). We recommend adding the following design guideline: "Site and design roads to avoid significant adverse impacts to wildlife movement." We recommend that all of these design guidelines apply to any development, not just subdivisions within an SEA.

In general, we strongly support the more inclusive SEA boundaries as proposed in the Draft General Plan and we commend the County on applying this approach. At the scale of the SEA map online, we are unable to definitively provide more specific comments. According to County staff, maps at a better scale, that can be overlain on other layers such as aeriels, will be provided online by the County in December. We look forward to reviewing those maps online, or other maps with staff, and providing more specific comments on the SEA boundaries at that time.

We continue to strongly recommend against making all single-family homes in SEAs exempt from Significant Ecological Area Technical Advisory Committee review (see the Conservancy's June 14, 2004 letter). Single family estates with vineyards, accessory structures, and other uses can often be much more damaging than a cluster of three moderate-sized homes. The exemption should be amended to state:

Individual single-family residences that will result in less than 5,000 square feet of surface area grading, where only one residence is proposed to be built on a legal lot or parcel of land, including project-related grading impacts.

Per the General Plan, additional information on the regulatory provisions of SEAs is included in the Technical Appendix; per the website the technical appendices will come later. We would appreciate the opportunity to comment on that technical appendix when it becomes available.

We strongly support the Implementation Action C/OS 5.3 (p. 139), although we recommend modifying the text (see also Schlotterbeck 2003<sup>1</sup>):

~~Consider adding Add~~ a new section to the Initial Study Checklist to create a review procedure for open space connectivity. ~~Habitat~~ Connectivity reviews shall consider the physical linkages on the project site and how it will maintain both local and regional habitat connectivity, particularly with regard to wildlife corridors.

We also support Implementation Action C/OS 5.2 (p. 139) to create a formal Mitigation Land Banking Program. However, it is not clear why this would only be mitigation for development in areas outside of SEAs, and why it could not include mitigation for development inside SEAs.

The County's Draft General Plan recognizes the challenges at the urban-wildland interface (p. 138). We recommend that another implementation action be added:

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<sup>1</sup>Schlotterbeck, J. 2003. Preserving Biological Diversity with Wildlife Corridors: Amending the Guidelines to the California Environmental Quality Act. *Ecology Law Quarterly* 30(4).

Implementation Action C/OS 4.6. Create guidelines for developments to minimize edge effects at the urban-wildland interface, which may include options for specific actions to manage pets, restrict lighting in open space, create compatible landscaping, etc.

Because of the cumulative impacts to native habitat from the conversion to vineyards, we recommend that the General Plan include the following policy (in Section IV. Agricultural Resources): “Policy C/OS 6.9. In remaining native habitat open space areas, discourage the extensive conversion of sensitive native habitat to agricultural land.”

### Scenic Resources

We support the Scenic Resources measures including Policy C/OS 11.1, to “Identify and protect scenic resources,” and Implementation Action C/OS 11.1, “Create a scenic corridor and scenic viewshed program and/or ordinance to protect the County’s remaining scenic resources.”

We recommend that a portion of State Route 14 be given a scenic designation, from its intersection with Escondido Canyon Road, west to the edge of the unincorporated Los Angeles County boundary. This area is included in the Soledad Canyon-Angeles Linkage Conceptual Area Protection Plan (CAPP). Some properties in the CAPP are actively being acquired for permanent protection, involving multiple partners and using several funding sources, including County funds. This area contains an absolutely unique viewshed and it includes the Pacific Crest Trail.

We look forward to reviewing the Technical Appendix (once it becomes available), which pertains to the selection of scenic resources, scenic corridors, and provides practices for their continued protection and preservation (p. 149).

### Park Uses

While the Conservancy, a State agency, is sovereign and not subject to local land use regulation, we have many partner agencies which may be affected by the General Plan. As many parks are located in the Open Space land use designation, it is important that necessary park facilities and operations are allowed in the Open Space land use designation. For example, in many cases, park agencies have acquired open space land and used existing buildings for staff residences or offices. We recommend that the following language be added to the open space land use designation (p. 39), under Open Space Conservation (OS-C), Open Space Parks and Recreation (OS-PR), and Water (OS-W):

“Includes passive recreation (e.g., trails) and open space parks and all associated support facilities/uses customarily found in conjunction therewith.”

If possible, we also recommend that the following specific language be included under these categories:

This includes, but is not limited to: park offices and staff residences, camp stores, parking, restrooms, camping, trails, habitat restoration, signage, park fencing/gates, and temporary uses typically allowed in the State Park system.

Also, park agencies will acquire land in the County in non-Open Space land use designations, such as Rural land use designations. It is important that park agencies can open and operate these parks right away for public use, for example, as required by some funding sources. It would be cumbersome to complete a General Plan amendment immediately to change the land use for every property that is acquired by a park agency in order to open and operate the park. We recommend that the following underlined language be added:

Purpose:...[T]he Rural designations:...Preserve areas of significant natural and scenic resources and allow for passive recreation and open space parks and all the associated support facilities/uses customarily found in conjunction therewith. (p. 27).

Under Intensity of Use (pp. 27-28), the underlined language should be added (and should be added to all Rural Land designations):

Rural Land 1. Rural land uses include single family homes, equestrian uses, agricultural and related activities, and other rural activities at one (1) dwelling unit per acre (1 du/ac) density, and passive recreation and open space parks and all associated support facilities/uses found in conjunction therewith.

Because park agencies may acquire land in other land use designations (other than Open Space or Rural), we recommend a blanket statement in the General Plan in the Conservation and Open Space Element (for example, under Goal C/OS-2, p. 132), such as the following:

Allow property in any land use designation to be used for passive recreation (e.g., trails) or open space parks and all associated support facilities/uses customarily found in conjunction therewith.

We recommend that Policy C/OS 4.2 be expanded to address other important park facilities to accommodate multiuse trail users (e.g., differently-abled individuals):

Promote strategically located staging areas, and trail heads, and other support facilities (e.g., parking, campsites, restrooms) to accommodate multiuse trail users.

Also, because many open space parks are established based on the presence of valuable biological resources, they are by definition likely to be included in the County's proposed SEAs. It is important that the SEA regulations proposed in the General Plan do not impede park uses and facilities. We recommend that language be added to the SEA regulations such as:

Passive recreation and open space park and associated support facilities and uses shall be allowed in SEAs. This includes, but is not limited to camping, parking, restrooms, signage, habitat restoration, park fencing/gates, and other uses typical of the State Parks system.

### Open Space Maps and Categories

It appears that some parks are not included as open space on the Open Space figure (identified as Figure 5.1 and 6.1), or Figure 3.2, Distributions of Land Use for Unincorporated Areas. Some of these parks that were excluded are in the Santa Monica Mountains Coastal Zone. You may contact our GIS Project Manager Marc Shores ([marc.shores@mrca.ca.gov](mailto:marc.shores@mrca.ca.gov)) to obtain the latest GIS layer of the Conservancy's and Mountains Recreation and Conservation Authority's (MRCA's) ownerships.

For the open space designations, a category should include parkland owned by MRCA, a local agency. This might fit under the category: "Other Park and Conservancy Land," (p. 124, and on the Open Space figure) with the following underlined text added: "Private recreation areas, private deed restricted open space, ownership by cities, other local agencies, joint powers authorities, and non-profits, and beaches..." We also recommend adding the Conservancy and MRCA to other park agencies that share the goal of managing open space and natural areas in the County (p. 123). The following underlined text should

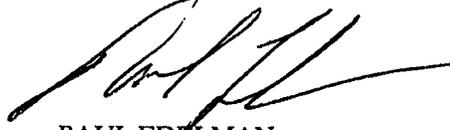
County of Los Angeles  
Draft General Plan  
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Page 9

also be added (p. 123): "Existing open spaces in the County include national forests, state, county, city, and other local parks, and nature preserves." The following underlined text should also be added (p. 130):

Many agencies and individuals own parcels within the 150,000-acre [Santa Monica Mountains National] Recreation Area. There are state, and federally, and locally owned parks, residential neighborhoods, and commercial developments.

Conservancy staff appreciates the opportunity to comment. Please direct any questions or future documents to Judi Tamasi of our staff by phone at (310) 589-3200 ext. 121, by email at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov) and at the above Ramirez Canyon Park address.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Edelman", with a long horizontal flourish extending to the right.

PAUL EDELMAN  
Deputy Director for  
Natural Resources and Planning



**SANTA MONICA MOUNTAINS CONSERVANCY**

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SMMC  
ATTACHMENT 2  
12/02/08  
ITEM 17



August 27, 2007

Bruce W. McClendon  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1309  
Los Angeles, California 90012

## OLD SMMC LETTER

### **Comments on County of Los Angeles Draft Preliminary General Plan Update and Significant Ecological Areas**

Dear Mr. McClendon:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on Los Angeles County's proposed General Plan Update and related documents. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

#### **Conservation/Open Space, Parks and Recreation Resources**

The Conservancy agrees with the proposed County Policy C/OS 1.2:

Create an established network of open space areas that provide regional connectivity, such as areas between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to the Puente-Chino Hills..

#### **Biological Resources**

It is critical to amend the following policy to the Conservation/Open Space Element Policy C/OS 5.1 in order to secure adequate protection of Significant Ecological areas (SEAs), given the potential for significant adverse environmental impacts from development in SEAs.

Maintain and monitor the program and network of Significant Ecological Areas (SEAs). Proposed developments in SEAs shall include mitigation for unavoidable impacts to SEAs from the removal, conversion, or modification

of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

The following policy should be added after Policy C/OS 5.1 to promote, monitor and ensure efforts to protect wildlife corridors.

Site roads to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as road kill) during continued operation of existing roadways and construction of new and expanded roadways.

The General Plan should show where potential habitat linkages remain to connect large regional open space areas, for example, specifically (a) across State Route-14 between Santa Clarita and Palmdale, and (b) across Interstate-5, north of Castaic to the Los Angeles County/Kern County line. The Missing Linkages study (scWP 2000) addressed numerous habitat linkages, including the two aforementioned. These areas must receive special wildlife corridor designation in the County General Plan Update.

Policy C/OS 5.3 addresses maintaining the integrity of the County's diverse plant communities. Other sensitive and declining plant communities, including coastal sage and native grasslands, should be considered in this policy, in addition of those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game (CDFG).<sup>1</sup> It has been estimated that about 70-90 percent of the pre-settlement coastal sage scrub in Southern California has been destroyed primarily by residential development.<sup>2</sup> Coastal sage scrub also supports a suite of sensitive wildlife and plant species. With respect to native grasslands, it has been estimated that there has been about 99 percent loss of native grassland in California.<sup>3</sup> Valley needlegrass grassland is recognized as very threatened by CDFG. The County should revise the statement C/OS 5.3

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<sup>1</sup> See sensitivity rankings "Sensitivity of Top Priority Rare Natural Communities in Southern California," determined by the California Department of Fish and Game.

<sup>2</sup>As cited in Noss et al.

<sup>3</sup>Kreissman 1991, as cited Noss et al.

as follows :

“Maximize the ecological function of the County’s diverse natural habitats, such as Joshua Trees, native Oak woodlands, Coastal sage scrub, Valley and needlegrass grasslands, and other perennial grasslands.”

**SEA Project Review – Minor Conditional Use Permit for SEA (Minor SEA-CUP)**

Under Biological Resources in Chapter 3 of the Open Space/Conservation Chapter in the General Plan, some exemptions would include new individual homes or desires an accessory to their single-family home within an SEA, a simple site plan review is only needed to verify that zoning standards are observed. This is an administrative procedure that the County deems unnecessary for the Minor SEA-CUP review.

There are numerous scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts, either individually or cumulatively, without adequate avoidance, mitigation, or public review. These procedures also state that if the project(s) on parcels located partially within an SEA, (provided the development area is outside of the SEA), the activity is exempt. Such a sweeping provision would not work with lots 2-acres or larger because both non-structural and future development can result in significant, ecological adverse impacts. For this reason, the proposed single family exemption from a CUP leaves a significant gap in protection. Any acreage above and beyond 2-acres should either be permanently protected with an irrevocable deed restriction or a conservation easement to a public park agency. Such deed restriction or conservation easement must prohibit all future development, including agriculture, non-native plants, equestrian facilities and non-fire department required brush clearance.

**SEA-CUP with Significant Ecological Area Technical Advisory Committee (SEATAC) Review**

The SEA Regulatory Review Procedures for CUPS (including SEATAC review) should provide the highest level of protection because realistically, large scale subdivision projects could potentially result in the greatest impacts to the SEAs. The following statement should be amended to:

“Recommendations ~~may~~ will include the clustering of structures away from sensitive areas, and then dedicating the area as natural open space to a public park agency. Other recommendations may include limiting lighting, protection of habitat linkages and movement corridors, providing wildlife-

permeable fencing, and maintaining a short distance between existing infrastructure regulating new development to limit grading of natural vegetation.”

### **Scenic Resources**

Upon review, the Conservancy recommends that the following statement to be amended as follows in Figure 5.6:

Preserve ~~significant~~ sensitive trees and habitats, natural watercourses, wildlife corridors and distinctive natural features.

Los Angeles' landscape is filled with hillside, scenic resources. It is essential to recognize the need to preserve important significant viewsheds found within the County. The Conservancy strongly recommends that the grading percentage qualification should be reduced from 25% to 15% under the Hillside Management Ordinance and the Hillside Management CUP. Topography and natural biological resources enable the residents of Los Angeles County to enjoy all the scenic resources, including the hillsides.

### **Soledad Canyon, Angeles Connector**

The Angeles Connector, also known as the Soledad Canyon Conceptual Area Protection Plan (CAPP), is a critical wildlife movement zone. The Connector is a critical biological pathway linking the two portions of the Angeles National Forest. Though it may not qualify as a SEA, the Conservancy strongly recommends that the CAPP area be included as a wildlife movement area in the County General Plan and all open space and SEA maps. Portions of the CAPP have been included alongside the Santa Clara River SEA (SEA 25), and a copy of the CAPP boundaries is attached.

### **Significant Ecological Areas**

The comments in this section refer to the draft documents and maps from the Los Angeles County Department of Regional Planning Website entitled “Significant Ecological Areas”, proposed as part of the General Plan Update. The Conservancy notes that the proposed SEAs are noticeably larger than those that are currently adopted within the County. The Conservancy continues to commend the County and the consultant team on the excellent work done for designating the boundaries of the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The Conservancy appreciates the

County of Los Angeles  
General Plan Update  
August 27, 2007  
Page 5

County's efforts on incorporating some of the Conservancy's prior recommendations regarding SEA boundaries.

**SEA 27, Santa Susana Mountains and Simi Hills**

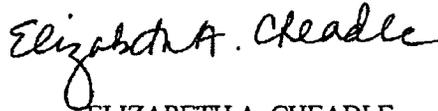
The Significant Ecological Area of the Santa Susana Mountains and Simi Hills should be expanded to include the following vital biological resources. A key part of supporting the SEA are the Big Cone Fir trees between Interstate-5 (I-5) and California State Route-14 (SR-14) in the southern boundary of the City of Santa Clarita and unincorporated Los Angeles County. The proposed boundary of SEA 27 at the junction I-5 and SR-14 lies just south of protecting a critical wildlife movement corridor that connects the Santa Susana Mountains from the west to the San Gabriel Mountains to the east. The wildlife corridor pathway is wedged between the two highways and crosses through the unique Big Cone Fir trees. The Conservancy strongly recommends that SEA 27 boundary be extended northward to encompass much more of the Big Cone Fir trees.

**SEA 25, Santa Clara River**

The Santa Clara River is a long, delicate Significant Ecological Area. The SEA boundaries near Agua Dulce Canyon and south of SR-14, should be extended east towards Escondido Canyon where there is an existing wildlife corridor leading to SR-14 lies just east of the Agua Dulce Canyon boundary found in SEA 25.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at the above Ramirez Canyon Park address provided above.

Sincerely,



ELIZABETH A. CHEADLE  
Chairperson



**SANTA MONICA MOUNTAINS CONSERVANCY**

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SMMC  
ATTACHMENT 3  
12/02/08  
ITEM 17



June 14, 2004

Mr. James Hartl  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

## OLD SMMC LETTER

### County of Los Angeles General Plan Update

Dear Mr. Hartl:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on Los Angeles County's proposed General Plan Update and related documents, including the Draft Significant Ecological Areas Proposed Regulatory Changes (from the County Department of Regional Planning website). The Conservancy provided related comments in an April 30, 2001 letter to the County on the Significant Ecological Areas Update Study, and in a December 23, 2002 letter to the County on the Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan (enclosed). (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

#### Conservation/Open Space Element

It is critical to add the following policy to the Conservation/Open Space Element (e.g., after Policy O-6.3) to ensure adequate protection of Significant Ecological Areas (SEAs), given the potential for significant adverse environmental impacts from developments in SEAs.

Proposed developments in SEAs shall include mitigation for unavoidable impacts to SEAs from the removal, conversion, or modification of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

Similar to proposed policies O-10.8 and O-12.1, which address recreational opportunities and watershed protection, the following policy should be added after Policy O-5.4 to promote proactive conservation efforts to protect sensitive biological resources:

Pursue and encourage public and/or private funding for the purchase of parcels and/or conservation easements within SEAs to preserve significant ecological resources.

The County is not in the position of advocating development; rather the County responds to and regulates development proposals. Policy O-5.1 should be amended to read: "Advocate Restrict development that is ~~highly compatible with~~ compromises biotic resources."

Policy O-5.3 addresses maintaining the integrity of the County's diverse plant communities. Other sensitive and declining plant communities, including coastal sage scrub and native grasslands, should be considered in this policy, in addition to those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game (CDFG).<sup>1</sup> It has been estimated that about 70-90 percent of the presettlement coastal sage scrub in southern California has been destroyed mostly by residential development.<sup>2</sup> Coastal sage scrub also supports a suite of sensitive wildlife and plant species. With respect to native grassland, it has been estimated that there has been about 99 percent loss of native grassland in California.<sup>3</sup>

Policy O-6.3 for SEAs should be amended as follows: "Site roads and utilities to avoid sensitive ~~critical~~ habitat areas or migratory paths." If "critical" habitat is retained, this may appear to limit the analysis to only habitat designated by the United States Fish and Wildlife Service as "critical habitat," when other areas also provide significant habitat values.

The following language should be added to Policy O-6.3 for SEAs, and this policy should also be added to the Circulation Element:

Site roads to avoid significant adverse impacts to wildlife movement.  
Mitigate adverse impacts to wildlife (such as roadkill) during continued

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<sup>1</sup> See sensitivity rankings, "Sensitivity of Top Priority Rare Natural Communities in Southern California," determined by the California Department of Fish and Game.

<sup>2</sup> As cited in Noss et al. 1995

<sup>3</sup> Kreissman 1991, as cited in Noss et al. 1995

operation of existing roadways and construction of new and expanded roadways.

As stated in the Conservancy's December 23, 2002 letter, the General Plan should show where potential habitat linkages remain to connect large regional open space areas, for example, specifically (a) across State Route-14 between Santa Clarita and Palmdale, and (b) across Interstate 5, north of Castaic to the Los Angeles County/Kern County line. The Missing Linkages study (SCWP 2000) addressed numerous habitat linkages, including these two. These areas must receive special wildlife corridor designation in the General Plan.

The Conservancy supports Policy O-10.9 which states in part "[a]dvocate development of... equestrian, biking and hiking trails..." The following policy should be added after Policy O-10.9: "Where feasible and consistent with public safety and operational uses, encourage joint use for public access on infrastructure access roads, and under utility lines."

The Conservancy supports Policy O-8.1, which states:

Protect the visual quality of scenic hillsides, including but not limited to ridgelines, hillside slopes and natural vegetation, to preserve the integrity of existing terrain—particularly areas located at key vantage points from public roads, trails and recreation areas.

### **Significant Ecological Areas Proposed Regulatory Changes**

The comments in this section refer to the draft document from the Los Angeles County website, entitled Significant Ecological Areas Proposed Regulatory Changes, proposed as part of the General Plan Update. The Conservancy notes that the proposed SEA boundaries are substantially larger than those currently adopted. The Conservancy continues to commend the County and the consultant team on the excellent work done for designating the boundaries of the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The Conservancy also appreciates the County's efforts to incorporate some of the Conservancy's previous recommendations regarding SEA boundaries (see the Conservancy's April 30, 2001 and December 23, 2002 letters enclosed).

However, the Conservancy is concerned that the proposed changes to the SEA Regulatory Review Procedures will not provide the needed protections for either the existing or the new expanded SEAs. Notably, additional exemptions to the SEA review process have been added, and many activities would be not be required to be reviewed by Significant

Ecological Areas Technical Advisory Committee (SEATAC), nor would they require a public hearing. The proposed regulations would result in four categories of SEA review: (1) exemptions from SEA review process (no SEATAC review, no public hearing), (2) Director's Review (no SEATAC review, no public hearing), (3) Minor Conditional Use Permit (CUP) (no SEATAC review, sometimes a public hearing is required), and (4) CUP (with SEATAC review and public hearing). (According to the SEAs Proposed Regulatory Changes, these SEA regulatory procedures do not apply to those areas within the Santa Monica Mountains Coastal Zone boundary; those projects are subject to a Coastal Development Permit.)

The Conservancy stresses that a community-level Biological Constraints Analysis must be required for all development projects requiring grading of more than 5,000 sq. ft. within SEAs. This is more consistent with current requirements (as stated in County of Los Angeles Department of Regional Planning Biological Constraints Analysis Guidelines, p. 1, from the County website). This is a key step as part of a proactive approach to adequately protect SEAs. This should be required for all projects grading over 5,000 square feet (sq. ft.) of surface area within SEAs, even those proposed to be exempt from SEA review (see below).

*SEA exemptions (no SEATAC review, no public hearing):* Under the SEAs Proposed Regulatory Changes, some exemptions would include new individual single-family homes, grazing, vegetation removal less than one acre (provided that no more than one acre is removed within a single calendar year), and grading of slopes less than 8 percent (provided that no more than 2,500 cubic yards of earth is moved).

There are uncountable scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts, either individually, or cumulatively, without adequate avoidance, mitigation, or public review. For example, single family homes are being built in the Simi Hills, in or near areas known to support the rare plant, Santa Susana tarplant, without adequate environmental review. There are cases where a new single-family home may be proposed in a visually sensitive area (e.g., visible from scenic roads, trails, parkland, etc.), resulting in significant adverse project-related impacts, or resulting in significant, adverse cumulative impacts from several single-family homes being built in the area. Also, extensive grazing over a large area, can result in significant degradation to native plant communities and sensitive species. Vegetation removal of one acre per year over several years, can also result in significant loss of native habitat and watershed protection. These types of activities can be particularly problematic if the development and vegetation removal occur in sensitive habitat areas near water sources used by wildlife (such as mammals), or near a habitat linkage chokepoint. The proposed new regulations would let such projects through like a super coarse sieve.

These procedures also state that projects on parcels located partially within an SEA (provided the development area is outside of the SEA) are exempt. It appears this may allow fuel modification and other harmful indirect effects on the SEA without consideration of simple avoidance alternatives that would be obvious from a constraints report.

The SEAs Proposed Regulatory Changes document states that several of these activities are not subject to a building or grading permit, thus are not under the scrutiny of zoning review. The Conservancy recommends that the County require SEATAC review for these activities. However, if the County proceeds with considering these activities exempt, then at the very least, the following changes should be made to the SEA exemption procedure. As stated above, a biological constraints analysis should be prepared for all of these aforementioned activities resulting in grading of over 5,000 sq. ft. of surface area within SEAs. The proposed exemptions should be modified as follows:

- New single-family residences, that will result in less than 5,000 square feet of surface area grading....
- Projects on parcels partially within a SEA, provided the development area (including the fuel modification areas) is outside of the SEA, the applicant proposes and commits to implement measures to minimize indirect effects to the SEA, and the County biologist has approved these measures.
- Grazing of horses...provided that the grazing and corrals occupy less than ½ acre.
- Vegetation removal less than one ½ acre total, provided that no more than one acre is removed within a single calendar year (in all years combined on a single property)...
- Grading of land with a slope of less than 8 percent provided that no more than 2,500 1,000 cubic yards of earth is moved.

The Conservancy recommends that at the very least the County biologist review these projects to ensure compliance with the exemption requirements.

*SEA Director's Review (no SEATAC review, no public hearing):* According to the SEAs Proposed Regulatory Changes, a "Director's review" would consist of a site visit by the County biologist, review of a checklist, and the possibility for recommended changes by the biologist, and/or recommendation to the Minor CUP process (which also does not require SEATAC review). These types of activities would have greater impacts than those proposed

under the exemption category, and they have the potential for significant, adverse environmental impacts, individually and cumulatively. The Conservancy recommends that these activities listed in this paragraph be subject to SEATAC review and that the public be afforded the opportunity to comment. If the County elects to maintain these activities in this SEA Director's Review category (with no SEATAC review and no public hearing), at the very least, the following changes should be made:

- Grading of land with a slope of less than 8 percent and over ~~2,500~~ 1,000 cubic yards but less than ~~5,000~~ 2,500 cubic yards of earth of moved.
- Vegetation removal of ~~1.0 to 2.5~~ ½ to 1.0 acre...

Also, on the checklist for those projects in the SEA Director's Review category, all streams, not just United States Geological Survey (USGS) blue-line streams, should be considered.

*Minor CUP (no SEATAC review, sometimes a public hearing is required):* The Minor CUP process would require certain Development Standards Applicable to Small Subdivisions and a Burden of Proof to be met, with no SEATAC review required. The Conservancy *strongly* recommends that all small subdivisions (4 units or less) within SEAs be required to be subject to SEATAC review, and that the public be afforded the opportunity to comment. The other activities proposed in this category should also be subject to SEATAC review, including relocation of two or more property lines between three or more contiguous parcels; grading under certain conditions, and vegetation removal under certain conditions. However, if the County proceeds with considering these activities under the proposed Minor CUP process, at the very least, the following changes should be made to the thresholds for this category, to the Development Standards Applicable to Small Subdivisions, and to the Burden of Proof.

If the County elects to maintain these activities in this category, the following changes should be made to the thresholds for this category:

- Grading of land with a slope of 8 percent or greater, but less than ~~25~~ 15 percent in an amount between ~~5,000~~ 2,500 cubic yards and ~~10,000~~ 5,000 cubic yards.
- Vegetation removal greater than ~~2.5~~ 1 acres but less than 20 percent of gross project area, or vegetation removal greater than 1 acre, but less than 2.5 acres....

Additional specificity is warranted for the phrases: "...maintain the remaining portions of the site in a natural undisturbed site..." (in 1.a. Development Standards Applicable to Small

Subdivisions, p.8), and "...setting aside appropriate and sufficient undisturbed areas..." (in 2.a. Burden of Proof, p. 9). The following language should be added to these two sections:

This shall be accomplished by dedicating the land in fee simple to an appropriate public entity capable of managing open space for resource protection and recreational use, or by granting conservation easements, or recording a offer to dedicate conservation easements, to the County and to an appropriate public entity capable of managing open space for resource protection and recreational use, prior to vegetation removal or grading.

In 1.c. Development Standards Applicable to Small Subdivisions, the language appears to allow development of a majority of the floodplain or stream, as long as a small portion is not altered. This language should be clarified so as to emphasize avoidance of the majority of the floodplain or stream. From a financial investment standpoint, it seems illogical to build in the floodplain. Also, avoidance of streams is preferred to protect the biological functions and values of the stream. This language should be changed as follows:

Not alter, grade, fill or build within the ~~entire extent of the~~ hydrological floodplain or biological margins of a river corridor, a blue line stream, or other perennial or intermittent watercourse to reduce the need for bank stabilization, unless no other alternative is feasible, the floodplain and watercourse have been avoided to the maximum extent, and appropriate mitigation measures will be implemented.

The proposed 100 foot buffer around wetland areas is not sufficient (1.d. Development Standards Applicable to Small Subdivisions, p. 8) to protect functions and values of the wetland. A buffer of 200-300 feet is more appropriate given the sensitivity of wetlands and the typical buffer recommended by the California Department of Fish and Game.

*CUP (with SEATAC review and public hearing):* The SEA Regulatory Review Procedures for CUPs (including SEATAC review), should provide the highest level of protection because presumably these activities could potentially result in the greatest impacts to the SEAs. Key protections should be added to Section 2. Burden of Proof (p. 11). Additional specificity regarding land dedications and conservation easements should be added to the language in Section 2.a., "...setting aside appropriate and sufficient undisturbed areas..." The language regarding land dedications and conservation easements proposed on page 7 of this letter for the Burden of Proof for Minor CUPs should be added to the requirements for CUPs. Language from Development Standards Applicable to Small Subdivisions relating

to providing wildlife-permeable fencing (1.e., f., p. 9) should be added to the requirements for CUPs. A requirement should be added to the Burden of Proof for CUPs (Section 2.a.) so that access roads are designed to minimize disturbance and avoid and minimize impacts to sensitive resources. Also, “..., protect habitat linkages and protect movement corridors” should be added to end of Section 2.e., Burden of Proof for CUPs, regarding preserving habitat connectivity. In addition, buffers of 200-300 feet to wetlands and streams should be a requirement in Section 2.d. Burden of Proof for CUPs.

*Other SEA Considerations:* The Conservancy supports the Specific Considerations for Individual SEAs (Section III., pp. 13-18 of SEAs Proposed Regulatory Changes). These include retaining connectivity and linkage values between the Santa Monica Mountains and Simi Hills, and maintaining linkages between large canyons of the Santa Monica Mountains SEA (p.17), limiting new development to outside the existing floodplain margins for the Santa Clara River SEA (p. 16), and retaining connectivity and habitat linkage values throughout the Santa Susana Mountains and Simi Hills for the Santa Susana Mountains/Simi Hills SEA (p. 18).

### **Land Use Element**

The Conservancy supports the intent of Policy L-2.2 and Policy L-3.1. Notwithstanding, the Conservancy supports the recommendation by San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy to make the following wording changes in these policies:

Policy L-2.2: Promote designs that preserve ~~significant~~ plant and animal habitats, natural scenery—including hillsides and ridgelines—cultural sites, public parklands and open space.

Policy L-3.1: ~~Promote~~ Establish improved inter-jurisdictional coordination of land use and transportation policy matters between the county, cities, adjacent counties, special districts, and regional and subregional agencies.

The following policy should be added to the Land Use Element after Policy L.2-11:

Require that it be demonstrated in development applications that developments are consistent with existing adopted plans including trails plans, parks plans, watershed plans, and river master plans.

### **Housing Element**

The Conservancy supports Policy H-5.8.A, which states in part: "Santa Monica Mountains: Limit housing due to the widespread presence of natural hazards, valuable natural resources..."

### **Circulation Element**

The Conservancy supports Goal C-6, and associated policies. This goal is a scenic highway system that preserves and enhances natural resources within its corridors while serving the public through various transportation modes and access to recreational opportunities.

Goal C-1 should be amended to read:

A balanced, multi-modal transportation system, coordinated with established and projected land use patterns, to serve the mobility needs of residents and commerce and , improve air and water quality, and protect natural resources.

The following policy should be added to the Circulation Element, after Policy C-1.6:

Site roads and utilities to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as roadkill) during continued operation of existing roadways and construction of new and expanded roadways.

The Conservancy acknowledges that the County has deleted a large portion of the extension of Pico Canyon Road from the proposed Highway Plan, compared to the existing Highway Plan, consistent with the recommendation made in the Conservancy's December 23, 2002 letter (enclosed). The Conservancy strongly recommends that this road not be extended on any County Highway Plans, or other plans.

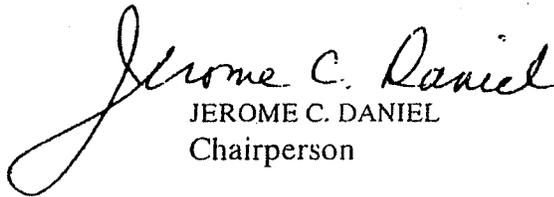
### **Safety Element**

Policy S-3.2 should be expanded to emphasize avoidance of fuel modification practices within public parklands. The following underlined language should be added:

Promote fuel modification practices that balance safety with natural habitat protection and that help reduce the risk of damaging runoff and erosion. For developments adjacent to parklands, site and design developments to allow required fire-preventative brush clearance to be located outside park boundaries unless no alternative feasible building site exists on the project site and the project applicant agrees to pay for required fuel modification within the parkland. Maintain a natural vegetation buffer of sufficient size between the necessary fuel modification area and public parkland.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Judi Tamasi of our staff at (310) 589-3200 ext. 121 and at the above Ramirez Canyon Park address.

Sincerely,

  
JEROME C. DANIEL  
Chairperson

**Literature cited**

Kreissman, B. 1991. California, an environmental atlas and guide. Bear Klaw Press, Davis, Calif.

Noss, R.F., E.T. LaRoe III, and J.M. Scott. 1995. Endangered Ecosystems of the United States: A Preliminary Assessment of Loss and Degradation. U.S. Department of the Interior, National Biological Service, Biological Report 28. February.

South Coast Wildlands Project (SCWP). 2000. Missing Linkages: Restoring Connectivity to the California Landscape-Proceedings. San Diego Zoo, San Diego. November 2.

**SANTA MONICA MOUNTAINS CONSERVANCY**

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December 23, 2002

County of Los Angeles  
Department of Regional Planning  
Attn: Mark Herwick,  
320 West Temple Street  
Los Angeles, California 90012

**Comments on Notice of Preparation for Comprehensive Update and Amendment  
to the Los Angeles County General Plan**

Dear Mr. Herwick:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Notice of Preparation (NOP) and Initial Study (IS) for Comprehensive Update and Amendment to the Los Angeles County General Plan (Project No. 02-305). The majority of the comments in this letter focus on the Significant Ecological Area (SEA) boundaries proposed in the document. (Because no additional information was provided in the NOP regarding management practices for these SEAs, we do not provide additional comments at this time regarding these.) This letter reiterates many of the comments provided by the Conservancy to Los Angeles County (County) on the Los Angeles County Significant Ecological Area Update Study 2000 documents (PCR *et al.* 2000a, 2000b) in a letter dated April 30, 2001 (enclosed).

The General Plan update effort includes the following (IS, pp. 1-2):

- Revisions to growth policies by updating population and housing projections for a new plan horizon year of 2025;
- Revisions to SEA boundaries and related policies, standards, and procedures;
- Technical conversion of land use policy maps to a digital format and realignment of boundaries to reflect assessor parcel boundaries;
- Revisions to transportation policy maps and highway plan;
- Revisions to Conservation and Open Space Element to reflect major changes in laws and current planning practices related to watershed planning and abatement of pollution from storm water runoff; and
- Revisions to boundaries of area and community plans to reflect recent city incorporations.

**Full Support for Specific SEA expansions and Some General Plan Objectives**

The Conservancy continues to commend the County and the consultant team on the excellent work done for the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The County and consultant team have made great strides in this effort and are moving in the right direction. The Conservancy continues to support the proposal to expand several existing SEAs, and to create the proposed Santa Monica Mountains, San Andreas Rim Zone, Antelope Valley, Santa Clara, and the East San Gabriel Valley SEAs. We support the additional expansion of the proposed SEAs since the SEA Update Study 2000, including a portion of the San Andreas Rift Zone SEA (in the northwest part of the County), and an area in the Castaic area near the Santa Clara River SEA (contiguous and south of the Angeles National Forest, bordered on the west by the Ventura-Los Angeles County line, and on the east by Interstate-5 [I-5]). (Please note that we look forward to providing additional comments when maps with a better scale are provided for public comments.)

The Conservancy also supports several project objectives identified in the IS, including “[p]reserve critical lands, including....strategic open lands” (IS, p. 3), and

“[p]rotect the National Forests and Santa Monica Mountains National Recreation Area for their significant natural communities, wildlife corridors, water recharge areas, and recreational opportunities...” (IS, p. 4).

**Maximum Inclusion of SEAs in Incorporated Areas**

The Conservancy’s April 30, 2001 letter recommends that the County analyze areas of existing SEAs in within City jurisdictions in the geographic limits of the County because some cities recognize the importance of SEAs in their General Plans, Zoning Ordinances, and special protective guidelines. To this end, the Conservancy supports the inclusion of the Verdugo Mountains and Tujunga Valley/Hansen Dam existing SEAs, as well as Griffith Park SEA, in the proposed SEAs (as shown on Figure 4 of the IS). These SEAs were not included in the SEA Update Study 2000. The Conservancy continues to recommend that because Ballona Creek will be studied later by a team comprised of County and City of Los Angeles appointees, a mechanism should be in place to include it later as an SEA.

**Additions to the Santa Susana Mountains/Simi Hills SEA**

The Conservancy appreciates the County’s efforts to partially incorporate the recommendations from the Conservancy’s April 30, 2001 letter to expand the Santa Susana

Mountains/Simi Hills SEA proposed in the November 2000 Update Study to include two additional areas (identified as Area A and Area B in our April 30, 2001 letter), and portions of the triangle of land north of the State Route (SR) 14 and I-5 intersection. However, we offer four main comments to fine-tune the boundaries of this SEA.

First, Santa Susana Mountains/Simi Hills SEA should be expanded to incorporate all of our proposed Area A (see April 30, 2001 letter), effectively including Browns and Mormon Canyon. Browns and Mormon Canyons are biologically critical components of the eastern Santa Susana Mountains ecosystem. Although the exact location of the proposed SEA boundary in this area is difficult to determine based on the scale of Figure 4, it appears that only part, or only the west side, of Mormon Canyon is proposed to be included in this SEA. All but a short section of Mormon Canyon is undeveloped, contributing to the ecological value of this canyon. Mormon Canyon is part of the Santa Susana Mountains ecosystem, and there appears to be no justification why half of the canyon would be cut out of this SEA. The entire canyon, including both sides of the canyon, and appropriate buffer (as shown in our proposed Area A) must be included in this SEA.

Second, Santa Susana Mountains/Simi Hills SEA should be expanded to incorporate all of our proposed Area B (see April 30, 2001 letter). The SEA should include all of the undeveloped area south of Pico Canyon, to the Old Road, up to the SEA boundary proposed in the IS. This area is ecologically important due to the presence of core wildlife habitat and high quality oak woodlands.

Third, we recommend that Santa Susana Mountains/Simi Hills SEA (or the expanded adjacent Santa Clara River SEA) be further expanded to include a critical area of the triangular habitat area north of the intersection of the north of the SR 14 and I-5 intersection (see Area C on the enclosed figures). This area is identified as a "Missing Linkage"<sup>1</sup> and preservation of the biological function of this area is essential to maintain connectivity between San Gabriel Mountains and Santa Susana Mountains. This triangle of land also contains high quality oak woodland and big-cone douglas fir.

Fourth, Santa Susana Mountains/Simi Hills SEA boundary should reflect a connection between existing SEA 64 (west of, and adjacent to I5, including the Westridge Open Space), and the remainder of the Santa Susana Mountains/Simi Hills proposed SEA (see Area D on

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<sup>1</sup>"Missing Linkages: Restoring Connectivity to the California Landscape." Conference held on November 2, 2000, San Diego, California. Proceedings written and compiled by Kristeen Penrod, South Coast Wildlands Project.

the enclosed figures). These areas are currently ecologically connected, and there appears to be no biological justification to representing them as isolated areas. (In the November 2000 Update Study, the SEA boundaries reflected these areas as connected.) The Conservancy prefers to depict the connection partially through the existing private open space on the developed Stevenson Ranch property, and partially through the Stevenson Ranch Phase V property (not yet built).

#### **Deletion of Pico Canyon Road from the Master Plan of Highways**

The Conservancy and its Joint Powers Authority, the Mountains Recreation and Conservation Authority (MRCA), cooperatively own and manage the 4,000-acre Santa Clarita Woodlands Park. Pico Canyon Road terminates within the northern portion of this park at the historic oil town of Mentryville. The ultimate alignment and width of Pico Canyon Road will be the principal determinant of whether the canyon's remaining scenic qualities are preserved.

The Conservancy recommends that Pico Canyon Road be deleted from the County's Master Plan of Highways. This recommendation is consistent with the Newhall Ranch Specific Plan Environmental Impact Report (EIR), which recommended deleting Pico Canyon south of the Specific Plan Area from the County's Master Plan of Highways. In addition, the NOP for the Stevenson Ranch Phase V project anticipates Pico Canyon Road to be a two-lane road with only minor contributions to any future project circulation needs. The owners of Stevenson Ranch Phase V property and the Southern Oaks project (Tract No. 43896) are not in favor of any further extension of Pico Canyon Road at highway design standards. This well-defined lack of future need to build Pico Canyon Road at highway standards, in combination with the regionally significant scenic, recreational, hydrological, and ecological resources of the concerned portion of Pico Canyon, dictates the protection of these public resources. Pico Canyon Road should be downgraded from a highway to a collector street on the County's Master Plan of Highways.

#### **Need for Policies to Protect Wildlife and Wildlife Movement With Respect to Roadways and Development**

The General Plan should discuss the issue of compatibility of roadways with wildlife in the Circulation Element and the Conservation and Open Space Element. Some impacts to wildlife from roadways include impeding wildlife movement and increasing road kill. Policies to avoid, minimize, and mitigate impacts to wildlife during continued operation of existing roadways and construction of new and expanded roadways should be included in the General Plan.

The General Plan must show in detail where potential habitat linkages remain to connect large regional open space areas. They should receive a special wildlife corridor designation. The General Plan would be deficient without recognizing these connections.

Specifically the General Plan should address wildlife movement across SR-14, in the stretch of SR-14 between Santa Clarita and Palmdale, in light of any proposed infrastructure improvements or development projects along SR-14. This area has been identified as a "Missing Linkage"<sup>1</sup> because it affords the potential habitat connection between the two portions of the Angeles National Forest, or between the San Gabriel Mountains and the Sierra Pelona Range.

The above-described potential habitat connection across SR-14 connects to another potential habitat connection across I-5, also identified as a "Missing Linkage"<sup>1</sup>. The General Plan should address wildlife movement across this area of I-5, north of Castaic to the Los Angeles County/Kern County line. This area provides for a potential habitat connection between the Angeles National Forest and Los Padres National Forest. The General Plan should include the following information for this potential habitat connection along I-5: the extent of open space remaining along this linkage, the presence and condition of existing underpasses, strategic potential locations for new underpasses to maximize wildlife movement, and where existing publicly-owned open space lands could complement those existing and potential new underpasses. This information is necessary to adequately analyze the impacts from any proposed infrastructure improvements or development projects along I-5, which may result from the General Plan guidelines.

### **Scenic Highway Element**

Per p. 15 of the document, the Scenic Highway Element will be rescinded and in its place, a scenic highway element will be added to the Circulation Element. This revision will eliminate most urban routes depicted in the adopted Scenic Highway Element, and will in turn focus on the scenic qualities present in rural routes (IS, p. 15). We look forward to reviewing which of these scenic highway designations will be eliminated.

### **Other Comments from Conservancy's April 30, 2001 Letter**

The Conservancy continues to make the following comments consistent with its April 30, 2001 letter:

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<sup>1</sup>"Missing Linkages: Restoring Connectivity to the California Landscape." Conference held on November 2, 2000, San Diego, California. Proceedings written and compiled by Kristeen Penrod, South Coast Wildlands Project.

LA County NOP for General Plan Update and Amendment

December 23, 2002

Page 6

- Expand the Santa Monica Mountains SEA to the east to include the eastern ridge of Mandeville Canyon through Upper Kenter Canyon to the 405 Freeway and east of the 405 Freeway to Hoag Canyon;
- Expand the proposed San Gabriel Canyon SEA westward to encompass the foothills of Altadena and Crescenta Valley to Tujunga Canyon, although the Conservancy notes that some small areas were added since the SEA Update Study 2000;
- Support Wildlife Corridor Conservation Authority's comments regarding the Puente Hills SEA;
- Apply a more comprehensive approach to designating the boundaries of the Santa Clara River SEA; and
- Consider including the Baldwin Hills as an SEA.

Thank you for the opportunity to comment on this document. We look forward to reviewing and commenting on the EIR. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

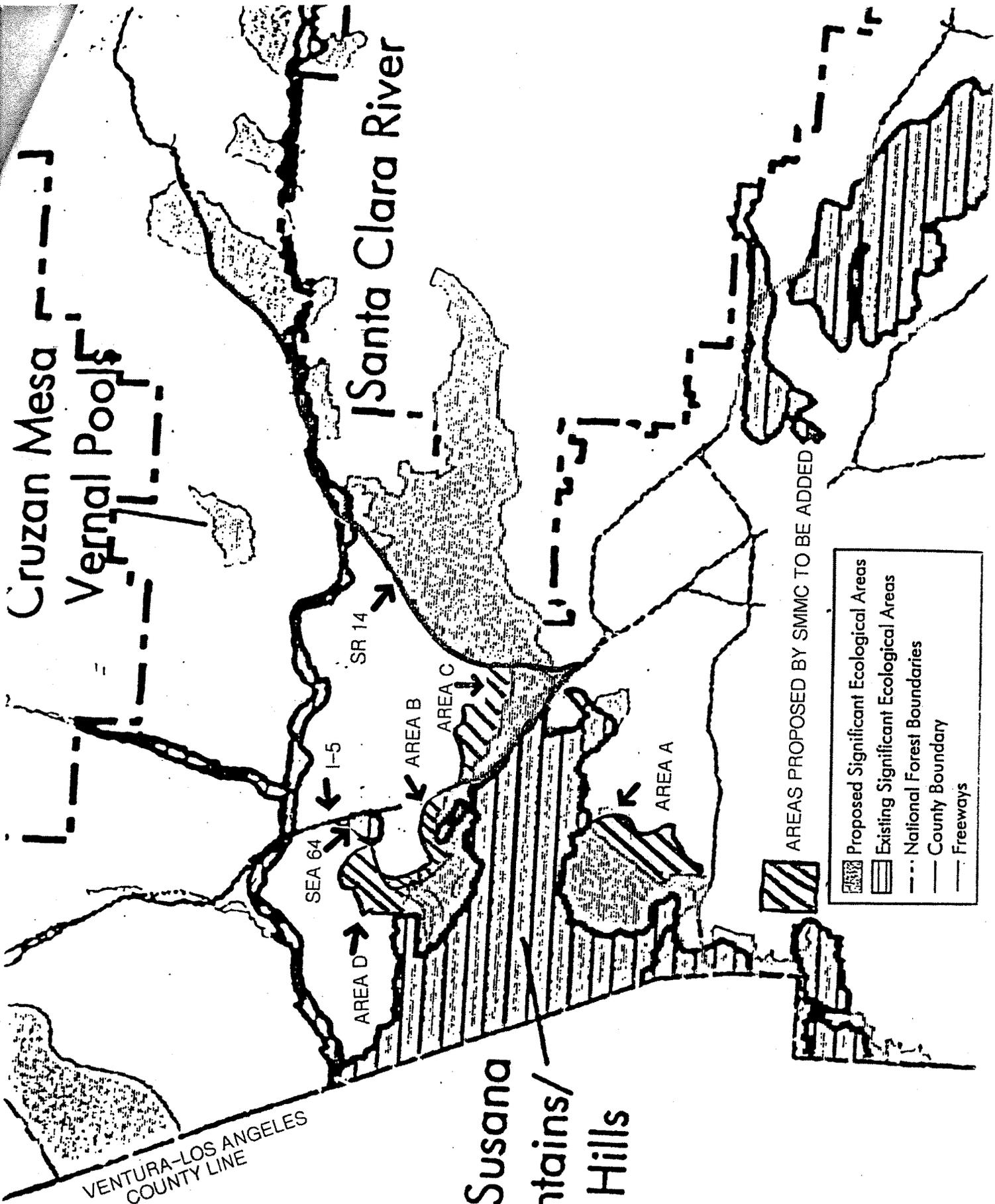


MICHAEL BERGER  
Chairperson

**Literature cited**

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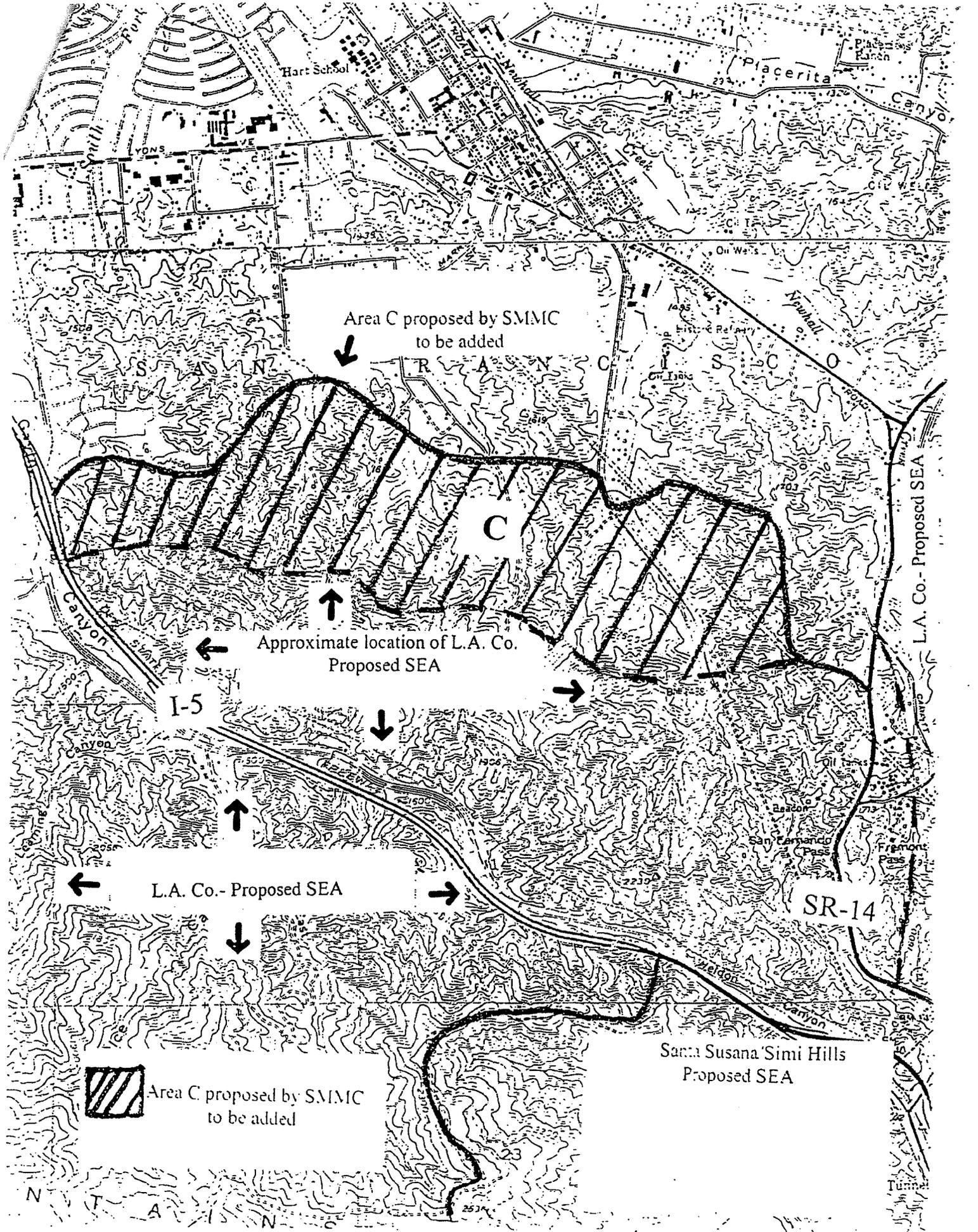


AREAS PROPOSED BY SMMC TO BE ADDED

	Proposed Significant Ecological Areas
	Existing Significant Ecological Areas
	National Forest Boundaries
	County Boundary
	Freeways

anta Susana  
Mountains/  
Simi Hills

ounty



Area C proposed by SMMC  
to be added

Approximate location of L.A. Co.  
Proposed SEA

L.A. Co.- Proposed SEA

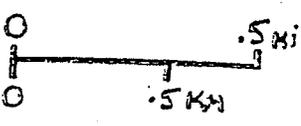
Santa Susana Simi Hills  
Proposed SEA

 Area C proposed by SMMC  
to be added

# Potential Open Space Connections in the NE Santa Susana Mtns

Newhall Ranch Specific Plan Area

-  Existing public open space
-  Potential open space
-  Private open space
-  Private land
-  Area developed
-  Proposed development
-  Sea boundary



Specific Plan Boundary

Stevenson Ranch Phase V

D

SEA 20

Approximate location of L.A. Co.- Proposed SEA

Mentryville

Approximate location of L.A. Co.- Proposed SEA

Newhall Ranch Open Space

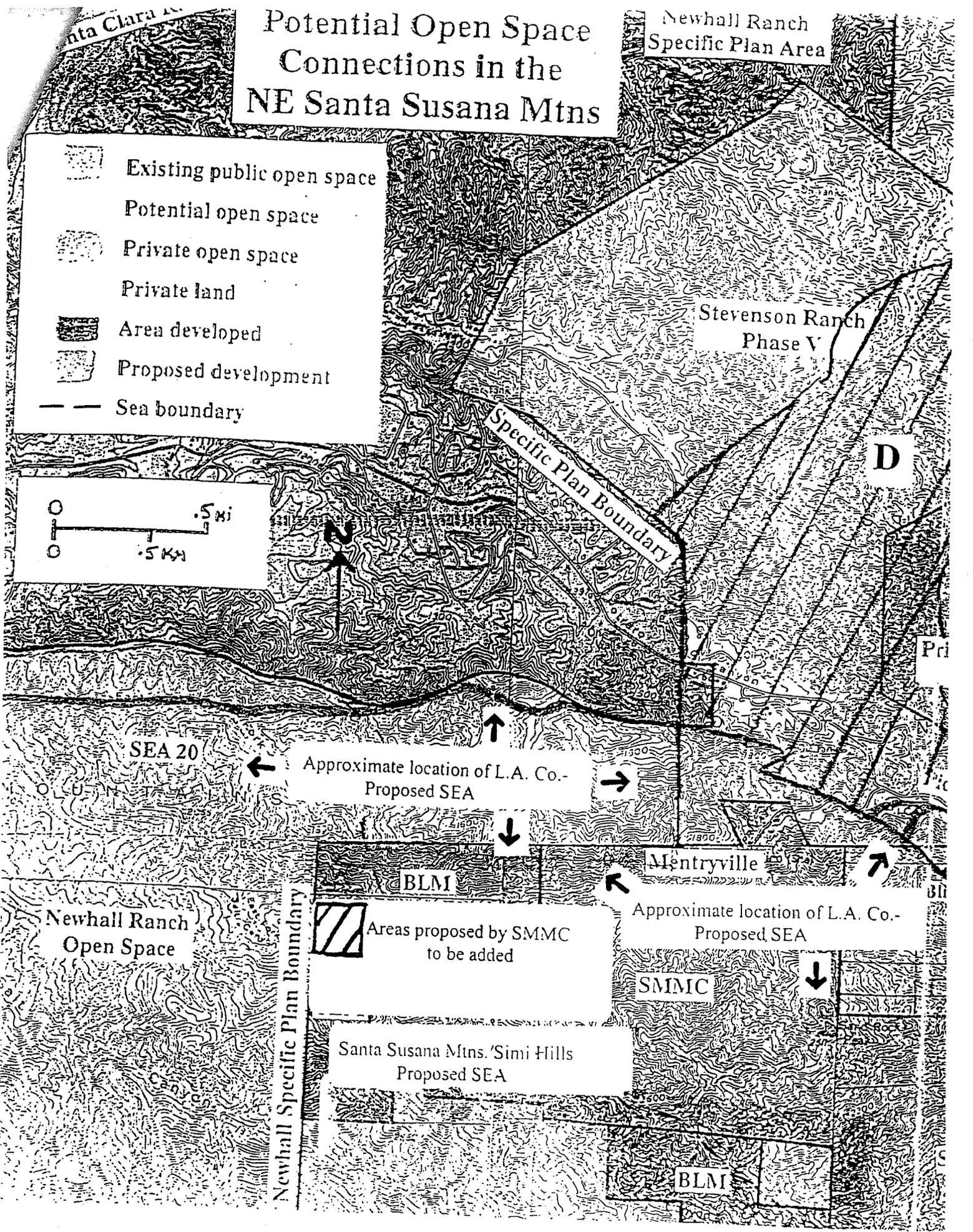
 Areas proposed by SMMC to be added

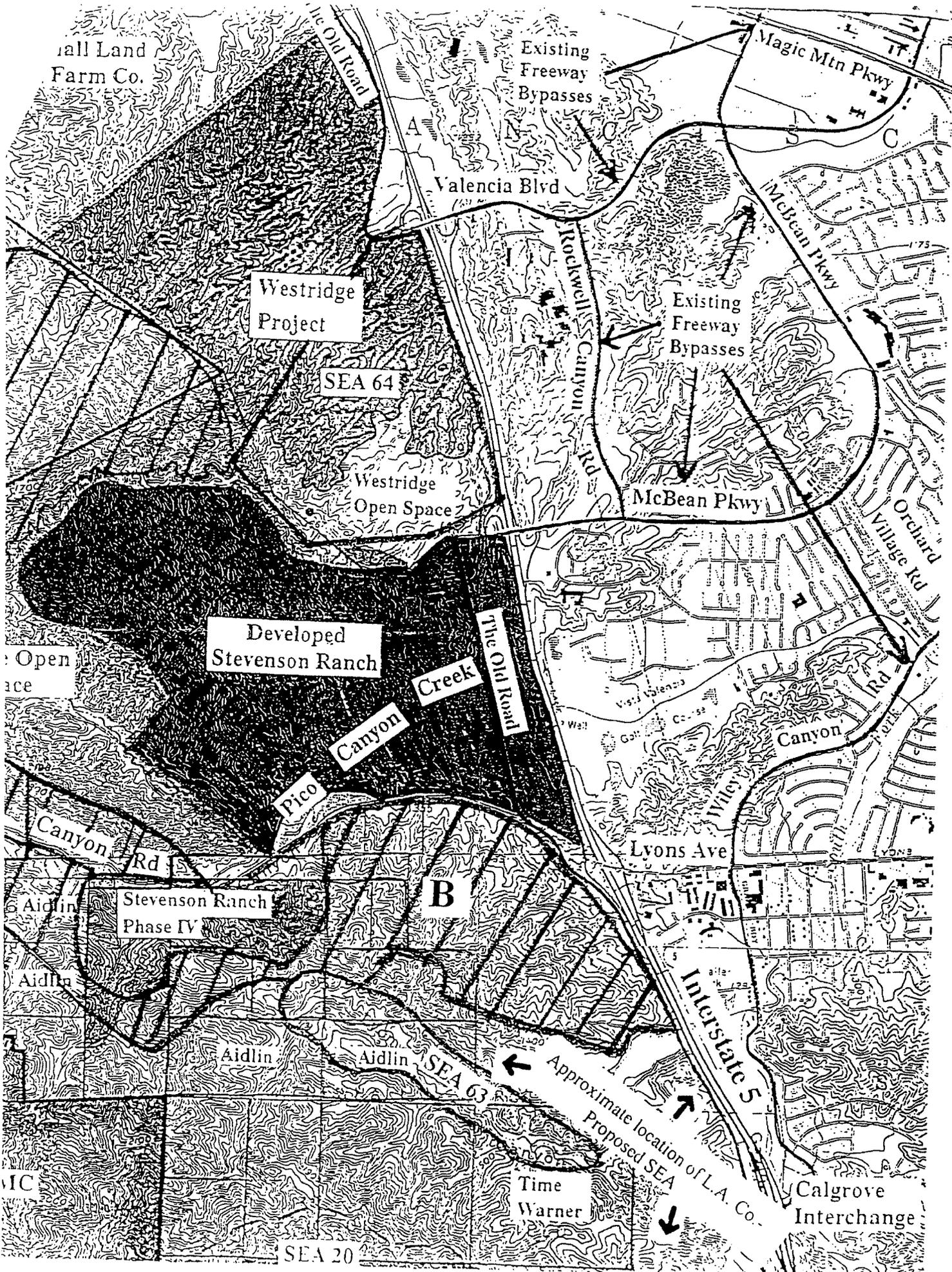
SMMC

Santa Susana Mtns. Simi Hills Proposed SEA

BLM

Newhall Specific Plan Boundary





Small Land Farm Co.

Existing Freeway Bypasses

Magic Mtn Pkwy

Valencia Blvd

Westridge Project

SEA 64

Existing Freeway Bypasses

Westridge Open Space

McBean Pkwy

Developed Stevenson Ranch

Creek

The Old Road

Pico Canyon

Wiley Canyon

Canyon Rd

Lyons Ave

Stevenson Ranch Phase IV

B

Interstate 5

Aidlin

Aidlin

Aidlin

Aidlin

SEA 63

← Approximate location of L.A. Co. Proposed SEA →

Time Warner

Calgrove Interchange

SEA 20

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207



April 30, 2001

George Malone, Section Head  
General Plan Development Section  
Los Angeles County, Department of Regional Planning  
320 West Temple Street, Room 13<sup>th</sup> Floor  
Los Angeles, California 90012

Comments on Los Angeles County  
Significant Ecological Area Update Study

Dear Mr. Malone:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Los Angeles County Significant Ecological Area Update Study 2000 documents prepared by the consultant team for the County of Los Angeles (County) (PCR *et al.* 2000a, 2000b). The County is revising the boundaries and regulatory policies for the existing 61 Significant Ecological Areas (SEAs) as part of the General Plan update effort. The objective of the SEA program has been expanded to include the future sustainability of biotic diversity in the County through the application of more current practices in conservation biology, primarily by consolidation into larger, interconnected SEAs (PCR *et al.* 2000b).

The Conservancy commends the County and the consultant team on the excellent work done for the SEA Update Study and specifically on the efforts to propose more inclusive and biologically sound SEAs. The County and consultant team have made great strides in this effort and are moving in the right direction. The Conservancy offers the following specific comments, and we look forward to working with the County and other interested parties to include the SEAs in the General Plan as recommended by the consultants.

Full Support for Specific SEA Expansions

The Conservancy fully supports the consultants' proposal to expand several existing SEAs, including the following: Santa Monica Mountains, San Andreas Rim Zone, Antelope Valley, Santa Clara River, and the East San Gabriel Valley. The entire Santa Monica Mountains range represents the nation's premier example of a Mediterranean ecosystem and meets all of the criteria for inclusion as an SEA. The San Andreas Rim Zone encompasses several regionally significant linkages for wildlife movement and globally unique vegetation communities. The proposed Antelope Valley SEA provides crucial

connectivity for wildlife movement, encompassing open washes, historic floodplains, riparian communities, desert scrub, and joshua tree woodlands (PCR *et al.* 2000b). Along the Santa Clara River, which is known to support numerous state and federally-listed species, the SEA boundary was proposed to be expanded along the western and northwestern edge of the Angeles National Forest, both inside and outside of the forest boundary. The proposed East San Gabriel Valley SEA contains critical habitat and a core population of the federally threatened coastal California gnatcatcher (*Polioptila californica californica*), and supports numerous plant communities restricted in distribution.

#### Maximum Inclusion of SEAs in Incorporated Areas

Some proposed SEAs that were studied included areas within a city jurisdiction while some SEAs were not studied because they occurred within a city jurisdiction. Some cities recognize the importance of existing SEAs in their General Plans, Zoning Ordinances, and special protective guidelines (PCR *et al.* 2000a). In coordination with other jurisdictions, the County should analyze the areas of existing SEAs within city jurisdictions in the geographic limits of Los Angeles County. At the very least, these areas of SEAs should be retained, as recommended by the consultant team (p. v; PCR *et al.* 2000a). For example, the Griffith Park existing SEA No. 37 was not studied because it is entirely within the City of Los Angeles jurisdiction (PCR *et al.* 2000a). Griffith Park and any remaining contiguous habitat should be included. Tujunga Valley/Hansen Dam and Verdugo Mountains existing SEAs should also be retained. In addition, because Ballona Creek will be studied later by a team comprised of the County and City of Los Angeles, a mechanism should be in place to include it later as an SEA.

#### Inclusion of Mandeville and Hoag Canyons in the Santa Monica Mountains SEA

The Conservancy recommends that the Santa Monica Mountains SEA be expanded to the east to include the eastern ridge of Mandeville Canyon through Upper Kenter Canyon to the 405 Freeway and east of the 405 Freeway to Hoag Canyon. This would provide for greater protection for the corridor used by wildlife to travel from the 405 Freeway to Griffith Park. In addition, both canyons contain core habitat values. Hoag Canyon contains the best example of sycamore and oak woodlands in the Santa Monica Mountains east of Topanga Canyon.

#### Additions to the Santa Susana Mountains/Simi Hills SEA

The Conservancy recommends adding to the proposed Santa Susana Mountains/Simi Hills SEA an area encompassing Browns Canyon and part of Mormon Canyon (see Enclosure).

Browns and Mormon Canyons are biologically critical components of the eastern Santa Susana Mountains ecosystem. With the exception of adjacent Devil Canyon, all other drainages on the southern-face of the Santa Susana Mountains within Los Angeles County are developed along their full lengths. Together, the Browns and Devil Canyon watersheds form the most ecologically rich block of habitat in this portion of the mountain range.

We concur with Don Mullally (see February 10, 2001, comment letter) that the wildlife corridors at Fremont Pass and Newhall Pass, located north of the intersection of the 14 and 5 Freeways, and connecting the San Gabriel Mountains to the Santa Susana Mountains, should be added to one of the SEAs (e.g., Santa Susana/Simi Hills SEA). This triangle of land between the San Gabriel Mountains and the Santa Susana Mountains is essential to maintain connectivity between the ranges. Over 75% of the undeveloped land in this triangle is of SEA quality with high quality oak woodland and big-cone douglas fir. We also concur with Mr. Mullally that the discussion of plant communities for the Santa Susana Mountains should be more extensive, including such plant communities as big-cone douglas fir associations, walnut woodlands, and native grasslands.

The Conservancy recommends that portions of the Pico Canyon watershed, as shown on the Enclosure, be included in this SEA. Much of this land is adjacent to extensive public ownership and is part of the core habitat area comprising the adjacent SEA.

#### Expansion of San Gabriel Canyon SEA to include Altadena and La Crescenta Foothills

The Conservancy recommends that the proposed San Gabriel Canyon SEA be expanded westward to encompass the foothills of Altadena and Crescenta Valley to Tujunga Canyon. This proposed expansion encompasses pristine chaparral, oak woodland, and riparian canyon bottoms. For example, Lower Millard Canyon in the Altadena foothills contains dense riparian woodland and heritage oak trees on upland shelves. These woodlands support a rich variety of warblers and other locally rare birds, reptiles, and amphibians. Animal species are able to move to different elevations in these canyons in response to seasonal changes and longer-term conditions such as drought.

These foothills of the San Gabriel Mountains provide for essential east-west wildlife habitat linkages between the north-south trending canyons. The SEA boundary must be moved westward to provide a complete east-west linkage system. An adequate lower elevation habitat linkage system is not contained in the higher elevation Angeles National Forest.

#### Concurrence with WCCA

The Conservancy concurs with the Wildlife Corridor Conservation Authority's recommendations adopted by their Governing Board regarding the proposed Puente Hills SEA in their May 2001 letter to the County.

#### Use Watershed Approach on Santa Clara River SEA

California Native Plant Society (CNPS) has recommended utilizing a watershed approach to define the SEAs. This approach should be considered by the County, particularly for the proposed Santa Clara River SEA. The Santa Clara River watershed including the river proper, surrounding upland areas, and tributaries have been documented to support numerous listed and otherwise sensitive species (PCR *et al.* 2000b). These species depend on substantial portions of undisturbed watershed. For this reason, the SEA must include additional drainages and slopes surrounding the Santa Clara River proper.

The Conservancy has previously commented to the County in reference to the Newhall Ranch Specific Plan and Draft Environmental Impact Report that a specific area must be preserved (letter dated February 11, 1997). This includes a continuous habitat connection and natural land trail corridor linking the existing Santa Clara River SEA No. 23 and the northern tip of the existing Santa Susana Mountains SEA No. 20. This also includes a prominent ridgeline, that defines the northern boundary of the existing SEA 20, separating the East Fork of Salt Canyon from the principal Potrero Canyon development area. It appears that the proposed Santa Clara River SEA contains this area, but it is difficult to determine this based on the maps provided. We request that this be verified by the County.

#### Inclusion of a Baldwin Hills SEA

The Land Capability/Suitability Study SEA Report (England and Nelson 1976), lists Baldwin Hills as SEA No. 38, but does not appear to be addressed in the SEA Update Study. The County and the Conservancy are members of the Baldwin Hills Regional Conservation Authority formed to coordinate open space preservation actions in the Baldwin Hills. A new state agency, the Baldwin Hills Conservancy, was established in January of this year. The Baldwin Hills supports a reasonably extensive example of coastal sage scrub left in the Los Angeles Basin. Coastal sage scrub is a California Department of Fish and Game sensitive rare natural community that has been reduced in range significantly and the Baldwin Hills would likely meet the criteria for an SEA.

### Support for Implementation of Land Use Management Practices Guidelines

Comprehensive Land Use Management Practices are recommended for all projects within SEAs, along with specific management practices for each proposed SEA (PCR *et al.* 2000a). These general and specific guidelines include limiting the percentage of disturbance in the SEAs to no more than 20 percent, providing buffers for rare plant communities such as riparian forests, and limiting the density of development in the SEAs. The Conservancy agrees that land use management guidelines such as those proposed in the SEA documents, or ones which provide even more protection, must be implemented to preserve the integrity of the SEAs.

We also support CNPS's recommendation that additional ordinances be considered. These ordinances should be explored further and could include the Land Use Management Practices Guidelines in the subject document and CNPS's specific recommendations. In particular, they should include: requiring wildlife-friendly fencing in linkages or corridors, preserving habitat, requiring publicly-held conservation easements on ungraded land, as well as limiting impermeable surface area.

### Expansion of Selection Criteria to Include Other Sensitive Species

Although the revised draft of selection criteria has already been distributed for review (p. 9; PCR *et al.* 2000a), please consider the following comment. Criterion A is limited to "the habitat of core populations of endangered or threatened plant or animal species," and does not include rare, candidate or proposed species. It would be logical to focus planning and resources on protecting core populations of rare species, in addition to threatened and endangered species, in order to reduce the likelihood of these species becoming listed in the future. The Conservancy also recommends adding "species previously thought to be extinct" to this criterion. In the rare and fortunate event that a species that was previously thought to be extinct is rediscovered, that species would merit maximum protection, including designating the area which it inhabits as an SEA.

LA County SEA Update Study  
April 30, 2001  
Page 6

Thank you for the opportunity to comment on this document. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,



MICHAEL BERGER  
Chairperson

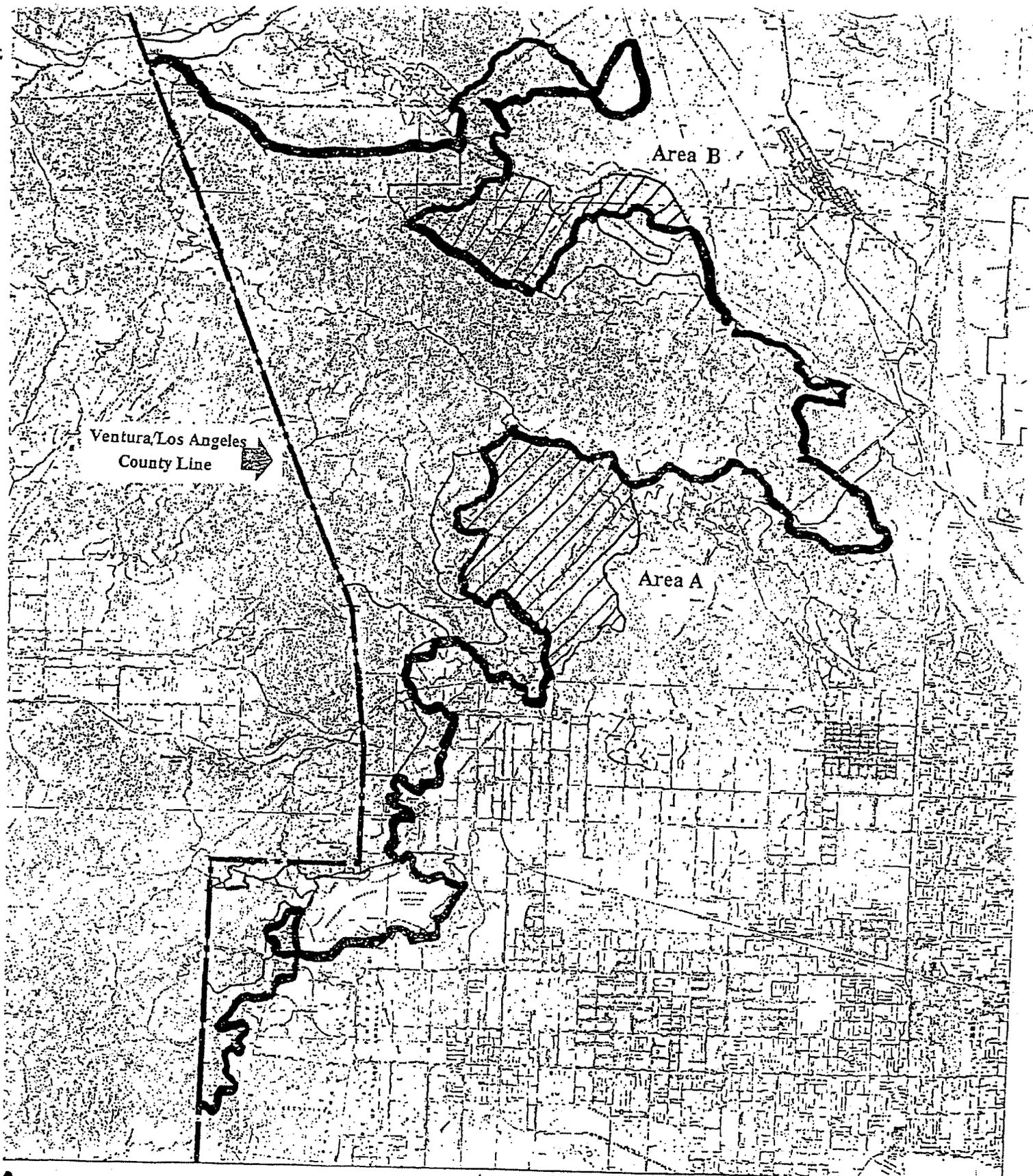
Enclosures (3)

**Literature cited**

England and Nelson Environmental Consultants. 1976. Land Capability/Suitability Study Los Angeles County General Plan Revision Program Significant Ecological Areas Report. Prepared for Los Angeles County Department of Regional Planning and Environmental Systems Research Institute.

PCR Services Corporation (PCR), Frank Havore & Associates, and FORMA Systems. 2000a. Los Angeles County Significant Ecological Area Update Study 2000 Background Report. Prepared for Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. Executive Summary of the Proposed Los Angeles County Significant Ecological Areas. Prepared for Los Angeles County Department of Regional Planning. November.



 Proposed SEA Boundary  
 Existing SEA Boundary  
 Angeles National Forest

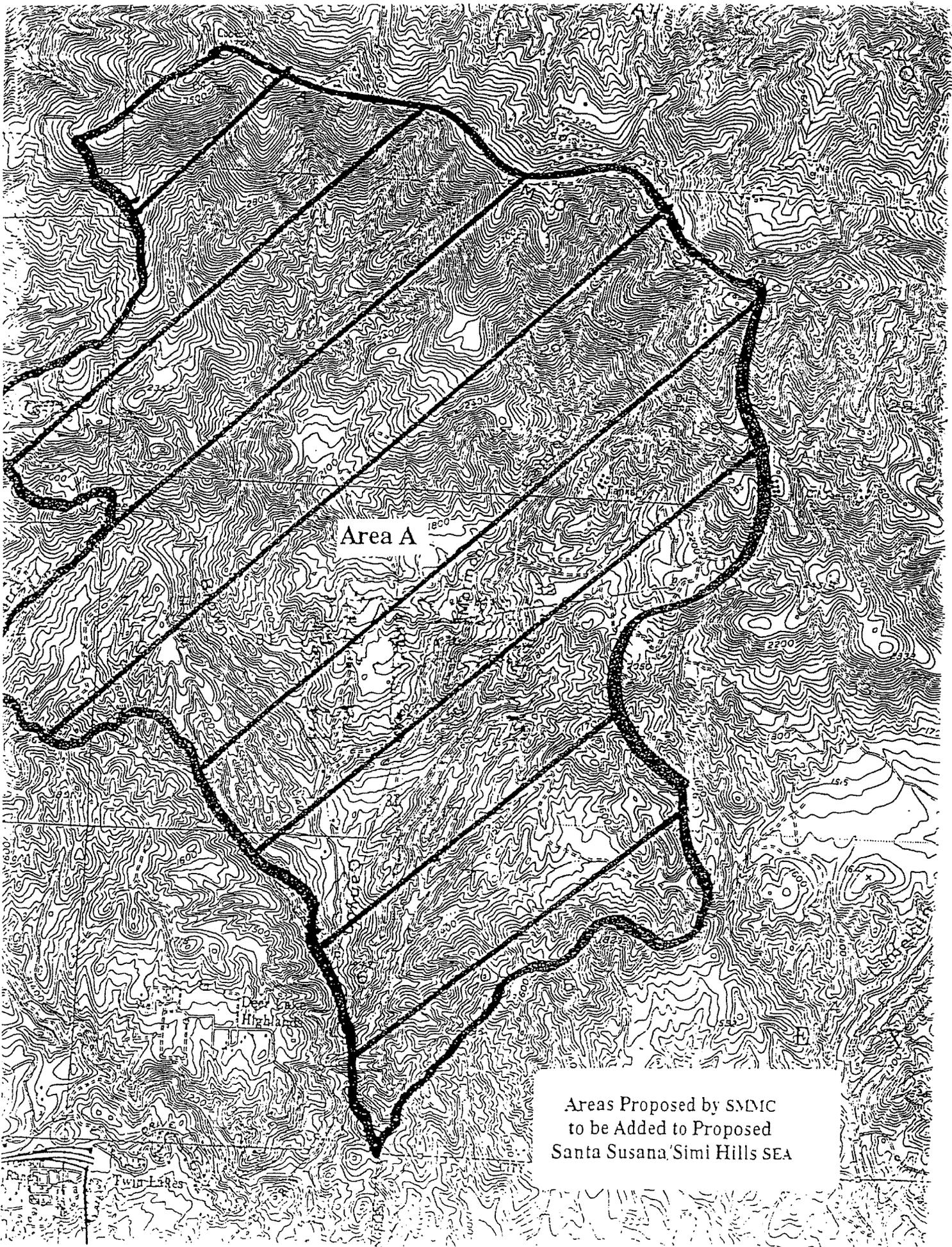
  
 Areas Proposed by SMMC  
 to be Added to Proposed  
 Santa Susana, Simi Hills SEA

Santa Susana Mountains/Simi Hills  
 Significant Ecological Area  
 Existing and Proposed Boundaries

0 9400  
 Feet

FORM Systems  
 10/24/00

Figure 2

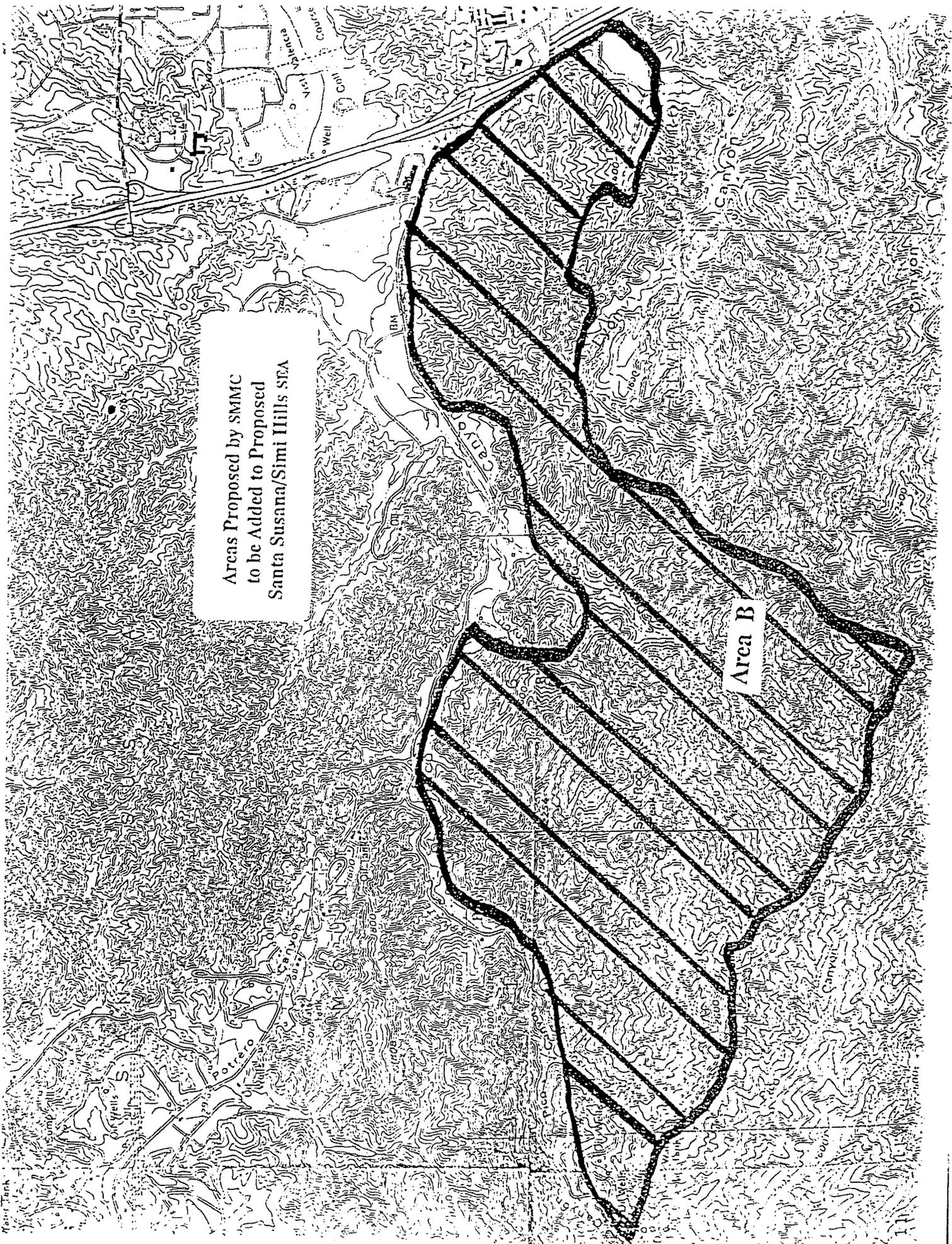


Area A

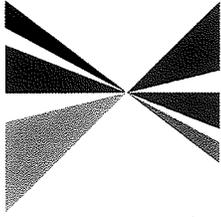
Areas Proposed by SMNC  
to be Added to Proposed  
Santa Susana/Simi Hills SEA

Areas Proposed by SMMC  
to be Added to Proposed  
Santa Susana/Simi Hills SEA

Area B







**ASSOCIATION of GOVERNMENTS**

August 29, 2011

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**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County General Plan and Antelope Valley Area Plan Update [I20110081]**

Dear Connie Chung and Thuy Hua:

Thank you for submitting the **Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County General Plan and Antelope Valley Area Plan Update [I20110081]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impact Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Section 65080 and 65082.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act (CEQA) Guidelines, Sections 15125 and/or 15206. The proposed project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan to accommodate new housing and employment opportunities in anticipation of population growth in Los Angeles County and the region.

Policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Visioning (CGV) that may be applicable to your project are outlined in the attachment. The RTP, CGV, and table of policies can be found on the SCAG web site at: <http://scag.ca.gov/igr>. For ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format (example attached).

The attached policies are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. **When available, please send environmental documentation ONLY to SCAG's main office in Los Angeles and provide a minimum of 45 days for SCAG to review.** If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895 or leep@scag.ca.gov. Thank you.

Sincerely,

Jacob Lieb, Manager  
Environmental and Assessment Services

**COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL  
IMPACT REPORT FOR THE LOS ANGELES COUNTY GENERAL PLAN AND  
ANTELOPE VALLEY AREA PLAN UPDATE [I20110081]**

**PROJECT LOCATION**

Los Angeles County is approximately 4,083 square miles, stretching 75 miles along the Pacific Coast of Southern California and bordered to the east by Orange County and San Bernardino County, to the north by Kern County and to the west by Ventura County. The County also includes two off-shore islands, Santa Catalina Island and San Clemente Island.

Unincorporated areas account for approximately 65 percent of the total land area of the County. The northern unincorporated areas in the County are sparsely populated and include two national forests and the Mojave Desert. The unincorporated areas in the County's southern portion consist of 58 noncontiguous land areas, referred to as the County's unincorporated urban islands.

Antelope Valley Planning Area is located in the northern portion of the County, bounded by Kern County to the north, Ventura County to the west, the Angeles National Forest to the south and San Bernardino County to the east. The area covers approximately 1,800 square miles and includes two dozen communities.

**PROJECT DESCRIPTION**

The proposed project is a comprehensive update of the Los Angeles General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs, and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update and Antelope valley Area Plan Update focus growth in the unincorporated areas with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas.

**Draft General Plan**

The proposed project is the preparation of a comprehensive update of the County's 1980 General Plan that meets California Code requirements for a general plan. The Draft Los Angeles County General Plan accommodates new housing and jobs within the unincorporated area in anticipation of population growth in the County and the region through the year 2035. The Draft General Plan has been designed to utilize, promote and implement policies that promote healthy, livable and sustainable communities, providing the framework of goals and policies to achieve countywide planning objectives and serves as the foundation for all existing and future community-based plans.

**Draft Antelope Valley Area Plan**

The proposed project will also replace the existing Antelope Valley Area Plan, a component of the Los Angeles County General Plan. The Area Plan addresses specific issues relevant to the Antelope Valley such as community maintenance and appearance, preservation of rural character, open space and agricultural lands and provides more specific guidance on General Plan elements. The Draft Area Plan also replaces all elements and the land use policy map.

**CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN**

**Regional Growth Forecasts**

The DEIR should reflect the most current SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion and city are as follows:

**Adopted SCAG Regionwide Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

**Adopted Los Angeles County Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	1,188,321	1,282,624	1,378,396	1,471,608	1,561,983	1,648,694
Households	325,615	357,468	391,383	417,848	443,414	464,468
Employment	320,171	336,371	346,717	358,881	371,868	384,300

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008. City totals are the sum of small area data and should be used for advisory purposes only.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that may be pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

***Regional Transportation Plan Goals:***

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

**GROWTH VISIONING**

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region’s mobility, livability and prosperity. The following “Regional Growth Principles” are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

**Principle 1: Improve mobility for all residents.**

- GV P1.1 *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2 *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3 *Encourage transit-oriented development.*
- GV P1.4 *Promote a variety of travel choices*

**Principle 2: Foster livability in all communities.**

- GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2 *Promote developments, which provide a mix of uses.*
- GV P2.3 *Promote "people scaled," walkable communities.*
- GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

**Principle 3: Enable prosperity for all people.**

- GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2 *Support educational opportunities that promote balanced growth.*
- GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5 *Encourage civic engagement.*

**Principle 4: Promote sustainability for future generations.**

- GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
- GV P4.2 *Focus development in urban centers and existing cities.*
- GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 *Utilize "green" development techniques*

**CONCLUSION**

As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here:

[http://www.scag.ca.gov/igr/documents/SCAG\\_IGRMMRP\\_2008.pdf](http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf)

**SUGGESTED SIDE BY SIDE FORMAT - COMPARISON TABLE OF SCAG POLICIES**

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggested format is as follows:

The complete table can be found at: <http://www.scag.ca.gov/igr/>

- Click on “*Demonstrating Your Project’s Consistency With SCAG Policies*”
- Scroll down to “*Table of SCAG Policies for IGR*”

SCAG Regional Transportation Plan Goals and Compass Growth Visioning Principles

Regional Transportation Plan Goals

Goal/ Principle Number	Policy Text	Statement of Consistency, Non-Consistency, or Not Applicable
RTP G1	Maximize mobility and accessibility for all people and goods in the region.	<b>Consistent:</b> Statement as to why <b>Not-Consistent:</b> Statement as to why or <b>Not Applicable:</b> Statement as to why
RTP G2	Ensure travel safety and reliability for all people and goods in the region.	<b>Consistent:</b> Statement as to why <b>Not-Consistent:</b> Statement as to why or <b>Not Applicable:</b> Statement as to why
RTP G3	Preserve and ensure a sustainable regional transportation system.	<b>Consistent:</b> Statement as to why <b>Not-Consistent:</b> Statement as to why or <b>Not Applicable:</b> Statement as to why
Etc.	Etc.	Etc.



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

September 7, 2011

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

SEP 12 2011

## **Notice of Preparation of a CEQA Document for the Los Angeles County General Plan and Antelope Valley Area Plan Update**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft environmental impact report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

### **Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as URBEMIS 2007 or the recently released CalEEMod. These models are available on the SCAQMD Website at: <http://www.aqmd.gov/ceqa/models.html>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM<sub>2.5</sub> emissions from construction and operational activities and processes. In connection with developing PM<sub>2.5</sub> calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM<sub>2.5</sub> emissions and compare the results to the recommended PM<sub>2.5</sub> significance thresholds. Guidance for calculating PM<sub>2.5</sub> emissions and PM<sub>2.5</sub> significance thresholds can be found at the following internet address: [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html).

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html). An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

### **Mitigation Measures**

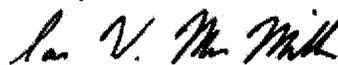
In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,



Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM  
LAC110823-04  
Control Number



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Ecological Services

Carlsbad Fish and Wildlife Office  
6010 Hidden Valley Road, Suite 101  
Carlsbad, California 92011



In Reply Refer To:  
FWS-LA-11B0355-11TA0552

SEP 14 2011

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

Subject: Notice of Intent (NOI) to Prepare a Draft Environmental Impact Report for the  
Los Angeles County General Plan and Antelope Valley Plan Updates,  
Los Angeles County, California

Dear Ms. Chung:

We have reviewed the Notice of Intent for the proposed update of the Los Angeles County General Plan and the Antelope Valley Plan which will provide the policy framework for how and where the unincorporated County will grow through the year 2035. We offer the following comments pursuant to the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), and in keeping with our agency's mission to work "with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people."

Our main concern regarding the proposed project is the potential for impacts to federally listed species and sensitive habitat types within Los Angeles County. To facilitate evaluation of the proposed update from the standpoint of fish and wildlife protection, we recommend that the DEIS include a description of the plan area updates and the environment in the vicinity of these updates, from both local and regional perspectives, including all practicable alternatives that have been considered to avoid and/or reduce project impacts to federally listed and other sensitive species and habitat types. Specific acreages and descriptions of the types of wetlands, riparian, coastal sage scrub, and other sensitive habitats that may be affected by the planning area designations should be included, as well as aerial photographs, maps, and tables that summarize this information. Please also include detailed information on the number and distribution of all Federal candidate, proposed, and listed species; State-listed species; and locally sensitive species that may be affected within the plan area.

Ms. Connie Chung (FWS-LA-11B0355-11TA0552)

2

We appreciate the opportunity to comment on the referenced NOI for potential impacts on threatened and endangered species and look forward to our continued coordination on this project. If you have any questions regarding this letter, please contact Katy Kughen of this office at (760) 431-9440, extension 201.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Dwyer". The signature is written in a cursive style with a large, prominent initial "J".

~~for~~ Karen A. Goebel  
Assistant Field Supervisor

# WILDLIFE CORRIDOR CONSERVATION AUTHORITY

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

**GLENN PARKER**  
CHAIR  
PUBLIC MEMBER  
ORANGE COUNTY

**MICHAEL HUGHES**  
VICE-CHAIR  
PUBLIC MEMBER  
LOS ANGELES COUNTY

**BOB HENDERSON**  
CITY OF WHITTIER

**RON KRUEPER**  
CALIFORNIA STATE PARKS

**BRETT MURDOCK**  
CITY OF BREA

SANTA MONICA MOUNTAINS  
CONSERVANCY

**DICKIE SIMMONS**  
LOS ANGELES COUNTY  
BOARD OF SUPERVISORS

**JACK TANAKA**  
CITY OF DIAMOND BAR

**HOWARD VIPPERMAN**  
CITY OF LA HABRA HEIGHTS

July 20, 2011

SEP - 6 2011

Ms. Connie Chung, Section Head  
General Plan Development Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

## Comments on Los Angeles County Draft 2035 General Plan Response to Pending Notice of Preparation

Dear Ms. Chung:

The Wildlife Corridor Conservation Authority (WCCA) was created to provide for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. WCCA has been following the General Plan and Significant Ecological Area (SEA) development closely. WCCA has provided comments on the General Plan in letters dated December 17, 2008; September 27, 2007; July 7, 2004, and December 20, 2002, and on the proposed SEAs in letters dated May 2, 2001 and April 30, 2001. We have attached those letters, and we incorporate those comments into this current letter by reference.

In this current letter, we emphasize several key comments, many of which were addressed in WCCA's previous letters. It is our hope that these changes can be made to the Draft General Plan prior to its circulation with the Notice of Preparation (NOP) such that they can be included in the environmental review. Any changes not incorporated into the Proposed Project must be included in an Environmentally Superior Alternative or the Environmental Impact Report (EIR) may be deficient. Because WCCA may not meet again until after comments are due, we request that this letter be treated as a response to the pending NOP.

### Puente Hills Significant Ecological Area Boundaries

In previous comment letters, WCCA expressed support for more inclusive proposed SEA boundaries (compared with existing SEA boundaries) and WCCA commended the County on applying this approach. We continue to compliment the County's efforts to propose more inclusive and biologically sound boundaries to ensure long-term sustainability of the SEAs, including the Puente Hills SEA.

***Savage Canyon/Worsham Canyon Should be Included***

WCCA again requests that the SEA be expanded to include Worsham and Savage Canyons in their entirety, identified as Area 2 in our April 30, 2001 letter and again here. There are multiple reasons for this request, foremost among which is that the area has known occurrences of coastal California gnatcatcher and, like the Aera site, contains the species' preferred coastal sage scrub-grassland interface.<sup>1</sup> WCCA's requested addition mostly consists of Arroyo Pescadero Park, owned and operated by the Puente Hills Landfill Native Habitat Preservation Authority. The SEA designation would reiterate the value of this already protected habitat area.

The requested addition also includes all of Worsham Canyon extending west to the urban-wildland interface. This habitat area is nearly identical to that farther up the canyon and serves as a valuable open space buffer for the more insulated habitat upstream. This ecological function deserves recognition by including it in the SEA.

Finally, this requested addition includes the Savage Canyon landfill, which has an estimated closure date in 2048, to provide additional open space buffer for the SEA. With the County's current planning horizon of 2035, it is not too early to signal the County's intention that the landfill be restored to native habitat. Because the existing landfill is already permitted, the only effect of inclusion in the SEA would be to influence the post-closure use of the site.

***Puente Hills Landfill Should be Included***

With the imminent closing of Puente Hills Landfill in 2013, the area to be reclaimed should be preemptively designated as part of the SEA to ensure effective biological resource management. With the obvious exception of the area needed for the Puente Hills Materials Recovery Facility or other continuing sanitation uses of the landfill property, the area is to become managed open space. The SEA designation would elevate biological resource values as a priority for the landfill area and, most critically, reconnect currently isolated portions of the SEA north of the cemetery. This connectivity benefit, irrespective of future habitat value, meets the criteria for inclusion in the SEA. WCCA is open to an alternative mechanism for recognizing this area's future biological significance. At a minimum, the General Plan must recognize the wildlife corridor through the landfill property that reconnects discontinuous portions of the SEA and provide for its restoration.

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<sup>1</sup>California Natural Diversity Database. Department of Fish and Game.

***Greater Reaches of San Jose Creek and San Gabriel River Should be Included***

WCCA is pleased to note that the Puente Hills SEA also incorporates nearby portions of Whittier Narrows and the San Gabriel River, as well as the adjacent Montebello Hills. These SEA designations should be extended to include all soft-bottom portions of San Jose Creek and a longer downstream reach of the San Gabriel River. These areas provide crucial stops for migratory birds along the Pacific Flyway as well as local habitat for resident species. The requested additions bring disparate portions of the SEA into closer geographic proximity, increasing the likelihood of exchange among bird populations and limited urban-tolerant terrestrial species. Together with the requested Puente Hills Landfill addition, the gap between SEA pieces would be reduced to one quarter of a mile from the current one mile. Furthermore, the Mountains Recreation and Conservation Authority owns a parcel in the requested San Gabriel River addition. The Montebello Hills contain an outstanding number of breeding pairs of coastal California gnatcatchers, which provides an opportunity for restoring this species in the west Puente Hills. Expanding the resources in this area will further facilitate these migrations.

***Suggested Expansion in La Habra Heights Included***

WCCA also recommended in our September 27, 2007 letter that the County widen the SEA identified as Area A in WCCA's previous letters, near the La Habra Heights/unincorporated Hacienda Heights border around Hacienda Boulevard (see map in September 27, 2007 letter). (The County had shrunk this area compared with the SEA boundary included in the November 2000 SEA report<sup>2</sup>.) We recommended that the County consider a wider SEA here in recognition of this area's critical importance to regional connectivity.

We note that in the current version, the County has widened this area (compared with the area referenced in our September 27, 2007 letter). We support this approach and believe the County has correctly designed the SEA in this corridor.

**Inclusion of WCCA SEA Expansions in EIR Alternative**

Should each of the above ecologically justified areas not be incorporated into the Draft General Plan, the EIR must include an alternative reflecting these larger SEA boundaries for the Puente Hills SEA, and that incorporates the comments on the SEA provided by WCCA (several previous letters) and the Puente Hills Landfill Native Habitat Preservation

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<sup>2</sup>PCR Services Corporation. 2000. Biological Resources Assessment of the Proposed Puente Hills Significant Ecological Area. Prepared for Los Angeles County Department of Regional Planning. November.

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Authority (August 29, 2007 letter, enclosed). The EIR will be deficient if it does not include a discussion of why areas identified by WCCA and/or the Habitat Authority are not included in the final SEAs.

### **Dedications of Land and Conservation Easements**

As stated in previous letters, WCCA concurs with many policies and implementation actions in the General Plan including Policy C/OS 1.3, which states:

Create an established network of open space areas that provide regional connectivity, between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to the Puente Chino Hills.

However, the Draft General Plan is lacking in addressing key issues with respect to open space dedications. As stated in our December 17, 2008 letter, an implementation action should be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require permanent open space dedications and protection as part of the development process to mitigate adverse environmental impacts. Open space dedications must be offered to open space park agencies or another entity acceptable to the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

Furthermore, the General Plan should include a policy or implementation action specifying the timing of any open space dedications. The General Plan should specify that if a conservation easement, conservation easement offer to dedicate (OTD), or fee title dedication is offered in conjunction with County-issued permit or approval, then that conservation easement, OTD, or transfer of deed is required to be recorded prior to the issuance of any permits or recordation of the tract map. Too many dedications have lingered and been forgotten.

The General Plan should also specify that appropriate entities to accept land transfers or conservation easements include open space park agencies, conservation agencies, or another entity acceptable to the County. Homeowners associations (HOAs) are not appropriate entities to accept such offers, as HOAs sometimes have missions and goals that conflict with the primary purpose of protecting natural land. (Ownership and/or management by HOAs of landscaped or modified areas is appropriate.) The General Plan should also emphasize fee simple dedications and conservation easements over deed

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restrictions, as they provide far greater assurances and enforcement for long-term protection of land.

In addition, the General Plan should specify that long-term maintenance funding must accompany any land transfer. It is ill-advised to assume that the accepting agency will have available funds to provide continued long-term management, and that it is the accepting agency's responsibility to subsidize the proposed development by providing the management funding. This funding can consist of one of the following options: (1) Community Facilities (Mello-Roos) District, (2) Landscape Maintenance District, or (3) an endowment obligation.

### **Trail Dedications**

The General Plan should include a policy or implementation action outlining the conditions under which a trail dedication could be required as part of the development approval process. As we stated in a previous letter (December 17, 2008), an implementation action should be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require trail easement dedications as part of the development process to mitigate adverse recreational impacts. Trail easement dedications must be offered to open space park agencies or another entity acceptable to the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

To ensure that the public benefits of trails are realized and recreational impacts avoided, this framework must include multiple steps and assurances regarding easement recordation, construction, and long-term maintenance. Where recreational resources are impacted by development, only the complete provision of a functional trail system is adequate mitigation. The General Plan should specify that if a trail easement or trail easement offer to dedicate (OTD) is offered in conjunction with County-issued permit or approval, then that trail easement or OTD must be required to be recorded prior to the issuance of any permits or recordation of the tract map. Prior to the trail easement being recorded, biological studies must be conducted with scientific data documenting that the trail can be designed to avoid damage to sensitive resources. Likewise, the applicant shall provide funding for construction and long-term maintenance of required trails unless the recipient agency or entity accepts this expense.

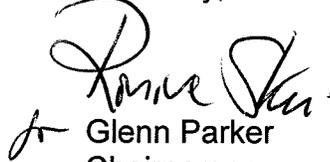
Ms. Connie Chung  
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### **Transfer of Development Rights Program**

WCCA supports the inclusion of a Transfer of Development Rights (TDR) program in the Draft General Plan. Such a program would relieve development pressure on sensitive rural areas and facilitate smart growth in urban centers, particularly in connection with transit-oriented developments. It is our understanding that such a program has been included in the Draft 2035 General Plan. WCCA is in full support of the proposed TDR program and looks forward to collaborating with County staff on its design and implementation. For your reference, we have attached the outlines of the proposed program as described by County staff. We believe that the program provides a unique opportunity to capture the economic benefits of development without the associated habitat loss in the Puente Hills wildlife corridor. WCCA would work with any willing developer to acquire and preserve remaining open space in the Puente Hills through this innovative planning vehicle.

We appreciate your consideration of these comments. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov). Thank you for your consideration.

Sincerely,



Glenn Parker  
Chairperson

Encs.:

- Proposed Additions to Puente Hills SEA
- Known Occurrences of Threatened Gnatcatcher Populations (CNDDDB)
- Correspondence with County staff regarding Transfer of Development Rights Program (June 14, 2011)
- WCCA letter on Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008 (December 17, 2008)
- WCCA letter on Los Angeles County General Plan Update (September 27, 2007)
- WCCA letter on County of Los Angeles General Plan Update (July 7, 2004)

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WCCA letter on Notice of Preparation for Comprehensive Update and Amendment  
to the Los Angeles County General Plan (December 20, 2002)

WCCA letter on Los Angeles County Significant Ecological Areas Update Study  
(May 2, 2001)

WCCA letter on Los Angeles County Significant Ecological Areas Update Study,  
Proposed Puente Hills SEA (April 30, 2001)

Puente Hills Landfill Native Habitat Preservation Authority letter on Draft Los  
Angeles County General Plan (August 29, 2007)







# Coastal CCA

11 4:45 PM

Info: Site avail



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**California Natural Diversity Database (gov [ds45])**

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**From:** Glaser, Mitch  
**To:** Eric Bruins; Paul Edelman  
**Cc:** Jason Smisko; Chung, Connie  
**Subject:** TDR Program  
**Date:** Tuesday, June 14, 2011 9:35:02 AM

---

Good Morning Eric and Paul:

On May 17, the Santa Monica Mountains Conservancy (SMMC) sent a letter to the Santa Clarita City Planning Commission regarding the City's General Plan Update. The City's General Plan Update is a component of "One Valley One Vision" (OVOV), which is a joint effort between the City and Los Angeles County. The other component is the County's Santa Clarita Valley Area Plan Update.

The SMMC letter stated, in part, "The Conservancy therefore recommends that the City include an additional policy that directs staff to work with the County to establish an inter-jurisdictional development rights transfer program wherein development rights from all rural-zoned parcels are eligible for transfer to urban-zoned areas, subject to reasonable conditions. Such a program could even provide a bonus for transferring rights from rural parcels within a SEA to leverage the benefits of such a program."

As you may be aware, the County is also in the process of updating its Countywide General Plan. A draft was released in April and may be found at the following Web Site:  
<http://planning.lacounty.gov/generalplan>

The Draft Countywide General Plan Update must undergo an environmental review (EIR) prior to public hearings. A Notice of Preparation for the EIR will be released shortly and we anticipate that the EIR will be released in early 2012. Public hearings before the County's Regional Planning Commission and Board of Supervisors will occur after the EIR is released and we anticipate that the Countywide General Plan Update will be adopted by the end of 2012.

The Draft Countywide General Plan Update includes a Transfer of Development Rights (TDR) implementation program, which I have copied below. The "Phase 2" timeframe means 3-5 years after adoption:

			Timeframe			
Implementation Program	Actions	General Plan Policies	Phase 1	Phase 2	Phase 3	Ongoing
Transfer of Development Rights Program	<ul style="list-style-type: none"> <li>Explore the feasibility of a Transfer of Development Rights (TDR) Program in order to direct growth and development away from valuable open space areas to identified infill areas.</li> </ul>	Land Use Element: Goals LU 3, LU 4		X		

	<ul style="list-style-type: none"> <li>· Identify open space, rural and agricultural areas, including Agricultural Resource Areas (ARA) and Significant Ecological Areas (SEAs), under development pressure as sending areas. Identify potential receiving areas, such as TODs and vacant and underutilized sites, in urban areas</li> <li>· Prepare an ordinance that outlines applicability and procedures for the TDR Program.</li> <li>· Establish County entity to coordinate the sales and transactions of TDR.</li> </ul>					
--	--	--	--	--	--	--

I feel that this TDR implementation program is in line with what the SMMC would like to see in the Santa Clarita Valley.

Given the large number of cities in the County, it would be practically impossible for the County to pursue an inter-jurisdictional TDR program with all of them. However, it is possible for the County to work with the City of Santa Clarita on this program, and it makes sense when you consider that the City is completely surrounded by County territory (unlike any other City in the County) and that the City and County are already committed to joint planning, as evidenced by the OVOV effort.

We could add another bullet point to the description of the program that would indicate that we will work with the City of Santa Clarita. The bullet point would be something to the effect of "Include the City of Santa Clarita in the TDR program in order to continue the joint planning efforts initiated by the One Valley One Vision program." Given the technical and legal challenges, we can't guarantee that we'll ultimately have an inter-jurisdictional program with the City, but this implementation program would commit the City to exploring the feasibility with us and working with us on our ordinance and (potentially) a companion ordinance in the City's Unified Development Code.

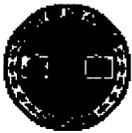
I have conferred with Jason Smisko, my counterpart at the City of Santa Clarita, and he indicated that the City is willing to participate in this program. He will acknowledge this during his presentation to the Santa Clarita City Council. I have also conferred with Connie Chung, my colleague who is responsible for the Countywide General Plan Update, and she is also willing to pursue this. I anticipate that the Draft Countywide General Plan Update will be amended accordingly.

I hope that this addition will fulfill SMMC's recommendation. If you have any questions or concerns, please feel free to contact me. As previously discussed, I will set up a meeting with the SMMC in the

near future to discuss the County's Santa Clarita Valley Area Plan Update and SMMC's concerns in that regard. The meeting will also provide an opportunity to discuss the Countywide General Plan Update and the County's Antelope Valley Area Plan Update, which is also in progress and will be adopted concurrently with the Countywide General Plan Update.

Thanks,  
Mitch

Mitch Glaser, AICP  
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December 17, 2008

Mr. Mark Herwick  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

### **Comments on Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008**

Dear Mr. Herwick:

The Wildlife Corridor Conservation Authority (WCCA) was created to provide for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente Hills and the Cleveland National Forest in the Santa Ana Mountains. WCCA offers the following comments on the Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008.

#### **Puente-Hills Significant Ecological Area**

In general, we support the more inclusive Significant Ecological Area (SEA) boundaries as proposed in the Draft General Plan and we commend the County on applying this approach. We also appreciate the County's proposal to include the wildlife linkages from the Missing Linkages report on the SEA map. A portion of the Puente-Chino Hills is identified as one of these linkages. However, we continue to recommend that the southwest portion of the Aera property be included in the Puente Hills SEA. In the Puente Hills Landfill Native Habitat Authority (Habitat Authority) letter, dated August 29, 2007, the Habitat Authority makes a compelling scientific argument for the inclusion of this biologically significant area. Although this area is used for oil drilling, it clearly meets the criteria for SEAs. It is not clear that in the County's process of delineating SEAs whether the County had a consistent process for exclusion of an area even if it met the criteria.

WCCA continues to be concerned with the narrow width of the proposed SEA in the center of the Puente Hills SEA. This area is narrower than in the version included in the SEA Update Study. There is no conceivable ecological justification to reduce the SEA width in this location. In WCCA's September 27, 2007 letter, we identified this area as Area A. At the scale of the SEA map online, we are unable to definitively provide more specific comments. According to County staff, maps at a better scale, that can be overlain on other layers such as aeriels, will be

provided online by the County in December. We look forward to reviewing those maps and providing more specific comments on this area at that time.

### **Open Space Dedications**

WCCA concurs with many of the goals, policies, and implementation actions in the Conservation and Open Space element such as Policy C/OS 2.1, "Develop and expand regional and local parkland in the County," and Implementation Action C/OS 1.1, "Coordinate with Local, State, and Federal park agencies and conservancies to acquire open space for recreation and biotic preservation throughout the County." However, implementation actions should be added at the beginning of the plan's life to encourage or require open space dedications as part of the development process. For example, Implementation Action C/OS 2.2 could be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require permanent open space dedications and protection as part of the development process to mitigate adverse environmental impacts. Open space dedications must be offered to open space park agencies or another entity acceptable to the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

In addition, under the Design Guidelines for SEAs (p. 135), we recommend adding the following underlined language:

2. At a minimum, retain a contiguous area of undisturbed open space over the most sensitive natural resources to maintain regional connectivity within the undeveloped area, and preserve this area in perpetuity through a recorded fee simple dedication to an open space park agency prior to the issuance of any permits.

We strongly support Policy C/OS 5.7, and we recommend the following underlined language be added:

Require that development mitigate "in-kind" for unavoidable impacts to biologically sensitive areas and permanently preserve mitigation sites, via fee simple dedications or permanent deed restrictions prior to the issuance of any permits.

To acknowledge the role that public conservation agencies have in the acceptance of open space dedications, the following underlined text should be added (p. 124, Section II. Open Space, Parks, and Recreation):

For the purposes of the General Plan, open space dedications are defined as privately owned lands that have been set aside for permanent open space, or dedicated in fee title or protected in some other manner by a conservation agency, as part of a larger land development proposal. Commitment of such lands to open space use in perpetuity is typically assured through deed restrictions or dedication of construction rights secured at the time of concurrent with, but not later than, development permit approval, or by protection by a conservation agency.

It is critical when County planners are reviewing development proposals, that they are aware of the locations of not only publicly-owned parks and open space, but also privately-owned land protected by conservation easements or deed restrictions. This is an important tool when planning the locations of developments and where future open space should be set aside. It is preferable that contiguous blocks of open space be protected, rather than ending up with disjointed patches. The following implementation action should be added:

Implementation Action C/OS 2.3. Within six months of approval of the General Plan by the County create, and update periodically, a GIS layer of protected open space owned by Federal, State, County, or other local agencies or non-profits to assist staff in the project review process and aid applicants in their project design. As the following information becomes available, the layer must include other protected lands, such as conservation easements and permanent open space deed restrictions.

### **Trail Dedications**

WCCA concurs with many of the trail measures in the General Plan, including Policy C/OS 4.1, "Expand multi-purpose trail networks for all users." As with open space dedications, we suggest that implementation actions be added to encourage or require trail dedications as part of the development process.

Implementation Action C/OS 4.2 could be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require trail easement dedications as part of the development process to mitigate adverse recreational impacts. Trail easement dedications must be offered to open space park agencies or another entity acceptable to the County.

Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

We support Implementation Action C/OS 4.1, as a GIS layer of proposed trails is a valuable tool for County planners to have when reviewing development applications. Knowing the locations of nearby existing trail easements is also highly valuable in order to successfully site a trail easement on a particular property so that it connects to any trail easements on adjacent properties, or so that it will eventually connect to easements on nearby properties. We recommend that the following underlined language be added:

Within six months of approval of the General Plan by the County, create, and update periodically, a GIS layer of proposed federal, state, county and adjacent city trailways and trailway segments, and existing and proposed trail easements and offers to dedicate trail easements, to assist staff in the project review process and aid applicants in their project design. Field verification should be conducted to determine the legitimacy of trail locations.

### **SEAs and Biological Protections**

We support the County's identification of the linkages, from the South Coast Wildlands Missing Linkages project, on Figure 6.3, Proposed SEA map. We also compliment the County on the inclusion of several important policies to protect SEAs. However, we do recommend some modifications such as adding the following underlined text to Policy C/OS 5.6:

Require that developments within an SEA be designed to meet the Significant Ecological Area Technical Advisory Committee recommendations, to the greatest extent possible, even if that means some substantial diminution of the property's economic value, and to...Preserve wildlife movement corridors; Site roads to avoid sensitive habitat areas or migratory paths;...Provide open or permeable fencing.

We support the Design Guidelines for a Model Subdivision Project in an SEA (p. 135) to locate development away from wildlife corridors... (5), avoid impermeable fencing outside the development... (6), and direct outdoor lighting downward, away from adjacent open space areas (7). We recommend adding the following design guidelines: "Site and design roads to avoid significant adverse impacts to wildlife movement." WCCA recommends that all of these design guidelines apply to any development, not just subdivisions within an SEA.

We continue to strongly recommend against making all single-family homes in SEAs exempt from Significant Ecological Area (SEATAC) review (see WCCA's September 27, 2007 letter). Single family estates with vineyards, accessory structures, and other uses can be more damaging than a cluster of three moderate-sized homes. The exemption should be amended to state:

Individual single-family residences that will result in less than 5,000 square feet of surface area grading, where only one residence is proposed to be built on a legal lot or parcel of land, including project-related grading impacts.

We strongly support the Implementation Action C/OS 5.3 (p. 139), although we recommend modifying the text (see also Schlotterbeck 2003<sup>1</sup>):

Consider [A]dding a new section to the Initial Study Checklist to create a review procedure for open space connectivity. Habitat connectivity reviews shall consider the physical linkages on the project site and how it will maintain both local and regional habitat connectivity.

We also support Implementation Action C/OS 5.2 (p. 139) to create a formal Mitigation Land Banking Program. However, it is not clear why this would only be mitigation for development in areas outside of SEAs, and why it could not include mitigation for development inside SEAs.

Per the General Plan, additional information on the regulatory provisions of SEAs is included in the Technical Appendix; per the website the technical appendices will come later. We would appreciate the opportunity to comment on that technical appendix when it becomes available.

The County's Draft General Plan recognizes the challenges at the urban-wildland interface (p. 138). We recommend that another implementation action be added:

Implementation Action C/OS 4.6. Create guidelines for developments to minimize edge effects at the urban-wildland interface, which may include options for specific actions to manage pets, restrict lighting in open space, create compatible landscaping, etc.

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<sup>1</sup>Schlotterbeck, J. 2003. Preserving Biological Diversity with Wildlife Corridors: Amending the Guidelines to the California Environmental Quality Act. *Ecology Law Quarterly* 30(4).

Because of the cumulative impacts to native habitat from the conversion to vineyards, we recommend that the General Plan include the following policy (in Section IV. Agricultural Resources):

"Policy C/OS 6.9. In remaining native habitat open space areas, discourage the extensive conversion of sensitive native habitat to agricultural land."

### **Scenic Resources**

We support the Policy C/OS 11.1, to "[I]dentify and protect scenic resources," and Implementation Action C/OS 11.1. "Create a scenic corridor and scenic viewshed program and/or ordinance to protect the County's remaining scenic resources." We concur with the Habitat Authority's (see letter dated August 29, 2007) support of considering Colima Road, Hacienda Road, Harbor Boulevard, and the 57 Freeway as Scenic corridors and adding Turnbull Canyon Road as a scenic corridor. We note that State Route 57 from the County line to State Route 60 is identified as Eligible Scenic Highway on Figure 6.6., Adopted and Eligible Scenic Highways. We do not see these other roadways identified in the VI. Scenic Resources section of the Conservation and Open Space Element. We anticipate this will be included in the Technical Appendices (p. 149) to be available at a later date, and we look forward to reviewing them once they become available.

### **Park Uses**

As many parks are located in the Open Space land use designation, it is important that necessary park facilities and operations are allowed in the Open Space land use designation. For example, in many cases, park agencies have acquired open space land and used existing buildings for staff residences or offices. We recommend that the following language be added to the open space land use designation (p. 39), under Open Space Conservation (OS-C), Open Space Parks and Recreation (OS-PR), and Water (OS-W): "Includes passive recreation (e.g., trails) and open space parks and all associated support facilities/uses customarily found in conjunction therewith."

If possible, we also recommend that the following specific language be included under these categories:

This includes, but is not limited to: park offices and staff residences, camp stores, parking, restrooms, camping, trails, habitat restoration, signage, park fencing/gates, and temporary uses typically allowed in the State Park system.

Also, park agencies will acquire land in the County in non-Open Space land use designations, such as Rural land use designations. It is important that park agencies can open and operate these parks right away for public use, for example, as required by some

funding sources. It would be cumbersome to complete a General Plan amendment immediately to change the land use for every land that is acquired by a park agency in order to open and operate the park. We recommend that the following underlined language be added (p. 27):

Purpose:...[T]he Rural designations:...Preserve areas of significant natural and scenic resources and allow for passive recreation and open space parks and all the associated support facilities/uses customarily found in conjunction therewith.

Under Intensity of Use (pp. 27-28), the underlined language should be added (and should be added to all Rural Land designations):

Rural Land 1. Rural land uses include single family homes, equestrian uses, agricultural and related activities, and other rural activities at one (1) dwelling unit per acre (1 du/ac) density, and passive recreation and open space parks and all associated support facilities/uses found in conjunction therewith.

Because park agencies may acquire land in other land use designations (other than Open Space or Rural), we recommend a blanket statement in the General Plan in the Conservation and Open Space Element (for example, under Goal C/OS-2, p. 132), such as the following:

Allow property in any land use designation to be used for passive recreation (e.g., trails) or open space parks and all associated support facilities/uses customarily found in conjunction therewith.

We recommend that Policy C/OS 4.2 be expanded to address other important park facilities to accommodate multiuse trail users (e.g., differently-abled individuals):

Promote strategically located staging areas, and trail heads, and other support facilities (e.g., parking, campsites, restrooms) to accommodate multiuse trail users.

Also, because many open space parks are established based on the presence of valuable biological resources, they are by definition likely to be included in the County's proposed SEAs. It is important that the SEA regulations proposed in the General Plan do not impede park uses and facilities. We recommend that there be language added to the SEA regulations such as:

Passive recreation and open space park and associated support facilities and uses shall be allowed in SEAs. This includes, but is not limited to camping.

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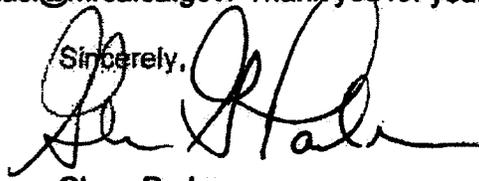
parking, restrooms, signage, habitat restoration, park fencing/gates, and other uses typical of the State Parks system.

**Open Space Categories**

For the open space designations, the category: "Other Park and Conservancy Land," (p. 124, and on the Open Space figure) should be modified as follows: "Private recreation areas, private deed restricted open space, ownership by cities, other local agencies, joint powers authorities, and non-profits, and beaches..." The following underlined text should also be added (p. 123): "Existing open spaces in the County include national forests, state, county, city, and other local parks, and nature preserves."

If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3200, ext. 121 or by email at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov). Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Parker", written over the word "Sincerely,".

Glenn Parker  
Chairperson

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September 27, 2007

Bruce W. McClendon, FAICP  
Department of Regional Planning  
General Plan Development Section  
County of Los Angeles  
320 West Temple Street, Room 1390  
Los Angeles, California 90012

## Comments on the Los Angeles County General Plan Update

Dear Mr. McClendon:

The Wildlife Corridor Conservation Authority (WCCA) provides the following comments on the Los Angeles County Draft Preliminary General Plan, proposed Significant Ecological Area (SEA) Ordinance, and the proposed Hillside Management (HMA) Ordinance. WCCA was created for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente-Chino Hills and the Cleveland National Forest in the Santa Ana Mountains. WCCA has been following this General Plan development process closely and has provided comments on the General Plan Update in letters dated December 20, 2002 and July 7, 2004, and on the proposed SEAs in letters dated April 30, 2001 and May 2, 2001. We have attached those letters, and they are incorporated into this letter. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and an ellipsis means the text should remain unchanged.)

### Puente Hills Significant Ecological Area Boundaries

As stated in WCCA's previous letters, WCCA commends the County and its consultants on the excellent work done for the update of the SEAs. Specifically, WCCA compliments the County's efforts to propose more inclusive and biologically sound boundaries to ensure sustainability of the SEAs. This is evident in the proposed Puente Hills SEA.

While the scale of the mapping of Figure 5.3 is not sufficient to do a complete review the Puente Hills SEA boundary, we do recommend three important changes. First, we recommend that an area east of Harbor Boulevard, at the southern boundary of the County to be included in the Puente Hills SEA. We made this recommendation in our April 30, 2001 letter to the County, and we identified it as Area 6, and it is shown on the attached color map. This area is a buffer for a canyon which forms a critical wildlife link south of Shea Homes across Harbor

Boulevard. This area appears to support the federally threatened species, coastal California gnatcatcher, and this area is functionally integral to the remainder of the proposed Puente Hills SEA. The SEA map for the Rowland Heights Community Plan should be updated to reflect inclusion of this Area 6.

Also, WCCA requests that the County consider connecting and making wider the area identified as "A" on the attached color map. It appears that the width of the proposed SEA has been made smaller in this area and in fact now the western and eastern portion appear to be disconnected, compared to the SEA boundary in the 2000 SEA report (PCR Services Corporation et al. 2000a). Extensive amounts of money have been spent to preserve nearly 4,000 acres in the western portion of the wildlife corridor. We recommend that the County staff reevaluate this area with a careful review of the 2000 SEA report, existing aerials, and existing plant communities to consider a wider SEA here in recognition of the regional connectivity of the western portion of the wildlife corridor to the remainder of the wildlife corridor to the east.

WCCA concurs with the inclusion of an area identified as Area 5 in WCCA's April 30, 2001 letter and this area is shown on the attached color map. This area forms the entrance to a small canyon which is a critical wildlife link and the area is core habitat of the western Puente Hills. The SEA map for the Rowland Heights Community Plan should be updated to reflect inclusion of this Area 5.

Our third recommendation is the inclusion of all land within the Puente Hills Landfill site that lies to the east and north of the areas designated for landfill operations in the current Conditional Use Permit. This would include land adjacent to Hacienda Heights and the Pomona Freeway. Good native habitat is present in this area and inclusion of this area would help link San Jose Creek and Whittier Narrows to the rest of the Whittier-Puente-Chino Hills wildlife corridor. The landfill will be closed in the future, and the final closure plan will determine the final use and habitat value of the landfill. This extension of the Puente Hills SEA would include those portions of Area 1, as identified in our April 30, 2001 letter, but exclude those areas designated for landfill operations in the current Conditional Use Permit. See also attached color map.

WCCA recommends that the County provide larger maps of the individual SEAs, that are overlain on relevant layers (e.g., topography) for reference, to facilitate the review by the public in future public review documents.

### **Management of Significant Ecological Areas**

In a previous letter (May 2, 2001), WCCA supported the management practices recommended in the 2000 SEA studies (PCR Services 2000a, 2000b). WCCA continues to support those recommendations. WCCA recommends that these management

practices be more explicitly incorporated into the General Plan and the SEA Ordinance. Specifically, the Background Report recommends that development of properties within SEAs should disturb no more than 20 percent of the SEA. It would be appropriate for the County to incorporate this into the SEA Ordinance and to establish a simple monitoring system that is checked periodically (e.g., every 5 years) to ensure consistency with this requirement.

### **Significant Ecological Areas Development Review**

Under the Draft Preliminary General Plan, projects in an SEA, unless exempt, will be subject to one of two regulatory processes: 1) Minor Conditional Use Permit (CUP) without Significant Ecological Area Technical Advisory Committee (SEATAC) review (Minor SEA-CUP), or Conditional Use Permit for SEA (SEA-CUP) with SEATAC review.

As stated in our July 7, 2004 letter, WCCA continues to be concerned about certain exemptions from SEATAC review for projects within SEAs. These include single-family homes, accessory structures to a primary use, and grazing. There are countless scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts. These types of activities can be particularly problematic if the development and vegetation removal occur in sensitive habitat areas near water sources used by wildlife (such as mammals), or near a habitat linkage chokepoint. Extensive grazing over a large area, can result in significant degradation to native plant communities and sensitive species. If the County chooses to retain single-family homes as an exemption, then this exemption should be amended to state:

Individual single-family residences that will result in less than 5,000 square feet of surface area grading, where only one residence is proposed to be built on a legal lot or parcel of land, including project-related grading permits.

These procedures also state that for project(s) on parcels located partially within an SEA, but with the development area outside of the SEA, the activity is exempt. Such a sweeping provision would not work with lots 2-acres or larger because both non-structural and future development can result in significant, ecological adverse impacts. For this reason, the proposed single family exemption from a CUP leaves a significant gap in protection. Any acreage above and beyond 2-acres should either be permanently protected with an irrevocable deed restriction or a conservation easement to a public park agency. Such deed restriction or conservation easement must prohibit all future development, including agriculture, non-native plants, equestrian facilities, non-fire department required brush clearance, and golf courses.

If the County chooses to retain grazing of horses or other animals as an exemption, then this exemption should be amended to state:

Grazing of horses or other animals and the construction of corrals as an accessory use, provided that the grazing and corrals occupy less than ½ acre, as allowed by the land use designation, zoning, and other applicable county regulations including, but not limited to, Chapters 12.36, 12.32, and 17.04 of the county code.

For activities that may not require a building or grading permit, but that have the potential to significantly impact SEAs, the County should develop procedures that specify a clear requirement for SEATAC review (e.g., for vegetation removal ½ acre or greater).

Furthermore, the SEA Regulatory Review Procedures for CUPs (including SEATAC review) should provide the highest level of protection because realistically, large scale subdivision projects could potentially result in the greatest impacts to the SEAs. The following statement in the Draft Preliminary General Plan (p. 120) should be amended to state:

“Recommendations may will include the clustering of structures away from sensitive areas, and then dedicating that area as natural open space to a public park or conservation agency. Other recommendations may include limiting lighting, protecting habitat linkages and movement corridors, using open-wildlife-permeable fencing, and maintaining a short distance between existing infrastructure and new development to limit grading of natural vegetation.”

## **Biological Resources**

Consistent with WCCA's comments in previous letter (July 7, 2004), we make the following comments. It is critical to amend the following policy to the Conservation/Open Space Element Policy (C/OS) 5.1 in order to secure adequate protection of SEAs, given the potential for significant adverse environmental impacts from development in SEAs:

Maintain and monitor the program and network of Significant Ecological Areas (SEAs). Proposed developments in SEAs shall include mitigation for unavoidable impacts to SEAs from the removal, conversion, or modification of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

WCCA supports Item 6 of Section F. Burden of Proof in the SEA Ordinance, which states: "Roads and utilities are located and designed to prevent damage to biotic resources or wildlife movement..." Similarly, the following policy should be added after Policy C/OS 5.1 to promote, monitor and ensure efforts to protect wildlife corridors. This should also be added to the Circulation Element under Goal C-3 pertaining to an environmentally sensitive circulation system.

Site roads to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as road kill) during continued operation of existing roadways and construction of new and expanded roadways.

Policy C/OS 5.3 addresses maintaining the integrity of the County's diverse plant communities. Coastal sage, a sensitive plant community, should be considered in this policy, in addition of those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game.<sup>1</sup> It has been estimated that about 70-90 percent of the pre-settlement coastal sage scrub in Southern California has been destroyed primarily by residential development (Noss et al. 1995). Coastal sage scrub also supports a suite of sensitive wildlife and plant species. The County should revise the statement C/OS 5.3 as follows: "Maximize the ecological function of the County's diverse natural habitats, such as Joshua Trees, native Oak woodlands, coastal sage scrub, walnut woodlands, and perennial grasslands."

### **Protection and Dedication of Natural Open Space**

WCCA supports several of the goals and policies of the Conservation & Open Space Element including, but not limited to, Policy C/OS 1.1, "Promote the acquisition and preservation of open space areas throughout the County" and Policy C/OS 1.2, "Create an established network of open space areas that provide regional connectivity...from the southwestern extent of the Mojave Desert to the Puente-Chino Hills."

Of note, when land is set-aside to be protected as permanent natural open space as part of the development review process, it is vitally important that legal mechanisms be put in place to avoid any confusion in the future regarding whether that land was intended to be protected in perpetuity. Equally important, the land that is to be protected as natural open space should be put under the ownership of a park or conservation agency, with the experience and mission to adequately protect that open space. To this end, ownership by a homeowners' association (HOA) is not adequate permanent protection for natural open space (e.g., endangered or rare species habitat, sensitive native plant communities, etc.).

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<sup>1</sup> See sensitivity rankings "Sensitivity of Top Priority Rare Natural Communities in Southern California," determined by the California Department of Fish and Game.

HOAs sometimes have missions and goals that are conflicting with the primary purpose of protecting the natural land. Ownership and/or management by HOAs of landscaped or modified areas is appropriate.

WCCA concurs with the intent of the language regarding proposed dedicated open space in several places in the Draft Preliminary General Plan and the Proposed SEA Ordinance. WCCA recommends the following changes to Section J. Conditions 2. Open space:

...Natural [o]pen space, where proposed or required, shall be permanently dedicated in fee to a public park or conservation agency, ~~held under common ownership~~, or other means acceptable to the regional planning commission or planning director, which extinguishes future development rights and to the maximum extent feasible, is contiguous [with] natural open space[.]

Similarly, in the Hillside Management Ordinance, WCCA recommends the following changes to Section M. Required Conditions:

1. Open Space. Open space shall be permanently dedicated and comprised of at least 25 percent of the net area of a development in an urban land use category, and at least 70 percent of the net area of a development in a rural land use category. Open space shall be contiguous natural open space, and shall be permanently dedicated in fee to a public park or conservancy agency ~~or held under common ownership~~...

### **Hillside Management Ordinance and Scenic Resources**

WCCA concurs with several policies and guidelines in the Scenic Resources section of the Draft Preliminary General Plan, such as #1 in Figure 5.6: Design Guidelines for a Model Project in Hillside Management Areas, which state: "Minimize grading and removal of natural vegetation."

WCCA recommends that the following statement to be amended to # 9, as follows in Figure 5.6: "Preserve ~~significant~~ sensitive trees and habitats, natural watercourses, wildlife corridors and distinctive natural features."

Los Angeles' landscape is filled with hillside, scenic resources. It is essential to recognize the need to preserve important significant viewsheds found within the County. WCCA strongly recommends that the grading percentage qualification be reduced from 25 percent to 15 percent under the Hillside Management Ordinance and the Hillside Management CUP. The natural topography and biological resources enable the residents of Los Angeles County to enjoy all the scenic resources, including the hillsides.

### **Trail Network**

There are several existing and proposed trails within the Puente-Chino Hills shown on the fold-out map entitled: Los Angeles County Riding and Hiking Trails (prepared by Department of Parks and Recreation 2001) in the Puente-Chino Hills area, that are not shown on Figure 5.2, Trail Network of the Draft Preliminary General Plan. These include Schabarum Extension Connector Trail (15), Rowland Heights Connector Trail (17), Rowland Heights Loop Trail (18), and portions of Schabarum Extension Trail (14), west of Fullerton Road. If these are not to be included, we respectfully request a justification for why each is proposed to be excluded. Otherwise, these should be included in the General Plan. As the Draft Preliminary General Plan states (p. 115): "Future development of trails will be easier to complete in areas with ample open space and parkland, such as...Puente Hills..."

Thank you for your consideration. If you have any questions, please contact Judi Tamasi of our staff at (310) 589-3200, ext. 121 or at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov).

Sincerely,



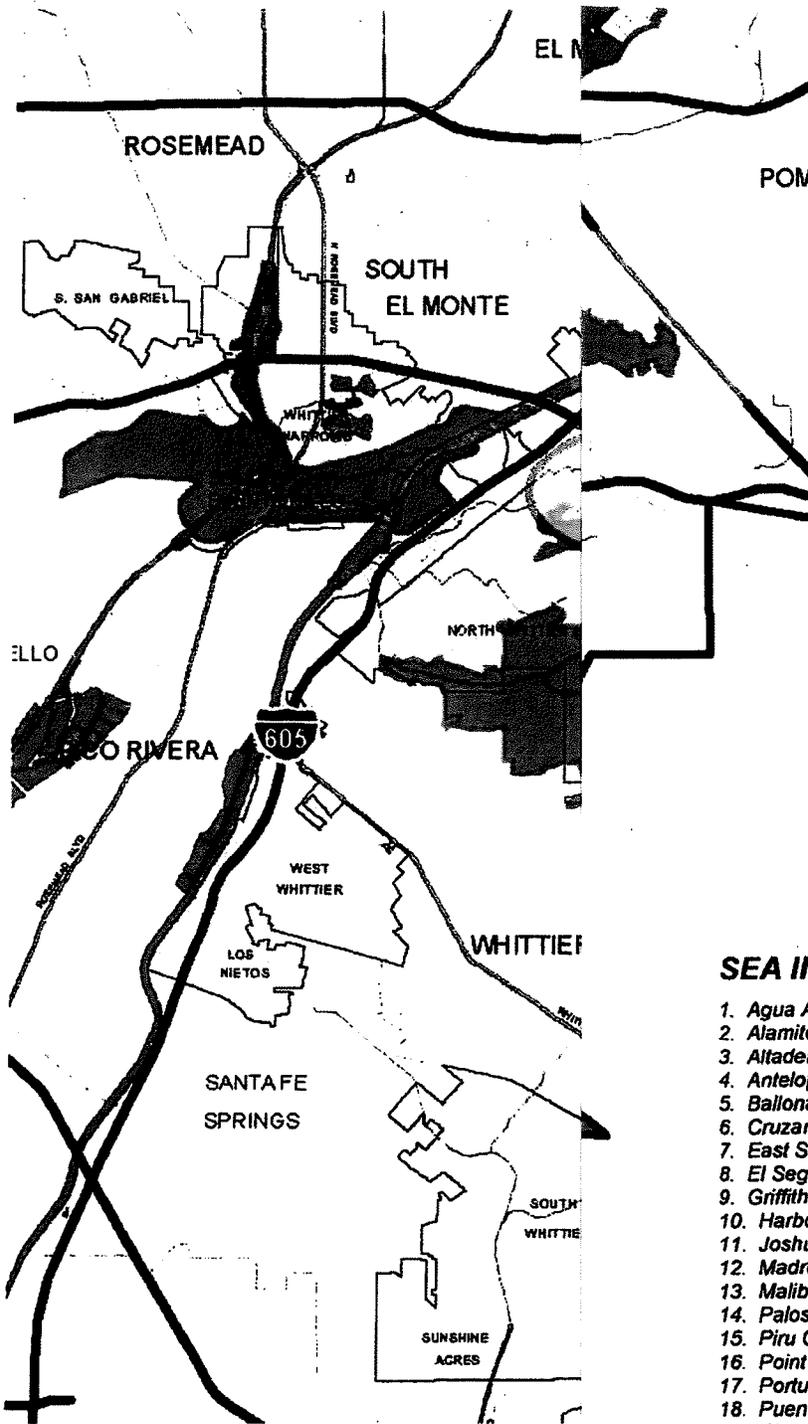
Bob Henderson  
Chairperson

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PCR Services Corporation, Frank Hovore & Associates, and FORMA Systems. 2000b. Los Angeles County Significant Ecological Area Update Study 2000 Background Report. Prepared for Los Angeles County Department of Regional Planning. November.



**COUNTY OF LOS ANGELES GENERAL PLAN**

**Proposed Significant Ecological Areas**

Except taken from Figure 5.3 (<http://www.wcca.org>)  
(August 2007)

See WCCA's September 2007 letter for more information.

**SEA INVENTORY:**

1. Agua Amarga Canyon
2. Alamitos Bay
3. Altadena
4. Antelope Valley
5. Ballona Creek
6. Cruzan Mesa Vernal Pools
7. East San Gabriel Valley
8. El Segundo Dunes
9. Griffith Park
10. Harbor Lake Regional Park
11. Joshua Tree Woodland
12. Madrona Marsh
13. Malibu Coastline
14. Palos Verdes Peninsula Coastline
15. Piru Creek
16. Point Dume
17. Portuguese Bend Landslide
18. Puente Hills
19. Rio Hondo Wildlife Sanctuary
20. Rolling Hills Canyon
21. San Andreas Rift Zone
22. San Dimas Canyon / San Antonio Wash
23. San Gabriel Canyon
24. Santa Catalina Island
25. Santa Clara River
26. Santa Monica Mountains
27. Santa Susana Mountains / Simi Hills
28. Terminal Island
29. Tujunga Valley / Hansen Dam
30. Valley Oaks Savannah
31. Verdugo Mountains

# WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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July 7, 2004

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Mr. James Hartl  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

## County of Los Angeles General Plan Update

Dear Mr. Hartl:

The Wildlife Corridor Conservation Authority (WCCA) offers the following comments on Los Angeles County's proposed General Plan Update, entitled Shaping the Future 2025, and related documents, including the Draft Significant Ecological Areas Proposed Regulatory Changes (from the County Department of Regional Planning website). WCCA provided related comments in a December 20, 2002 letter on the Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan, and in April 30, 2001 and May 2, 2001 letters on the Los Angeles County Significant Ecological Areas (SEAs) Update Study (enclosed). Of those comments listed below, WCCA is most interested in assuring that the SEA Regulatory Review Procedures continue to provide adequate review opportunities for developments in SEAs and that they provide adequate protection for SEAs. Many of the following comments are based on comments provided by the Santa Monica Mountains Conservancy in a June 14, 2004 letter to the County. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

## Significant Ecological Areas Proposed Regulatory Changes

The comments in this section refer to the draft document from the Los Angeles County Department of Regional Planning website, entitled Significant Ecological Areas Proposed Regulatory Changes (dated March 11, 2004), proposed as part of the General Plan Update. As stated in previous letters, WCCA commends the County and its consultants on the excellent work done for the update of the SEAs. Specifically WCCA compliments the County's efforts to propose more inclusive and biologically sound boundaries to ensure sustainability of the SEAs. This is evident in the proposed Puente Hills SEA.

However, WCCA is concerned that the proposed changes to the SEA Regulatory Review Procedures (Section II of the Significant Ecological Areas Proposed Regulatory Changes) will not provide the needed protections for either the existing or the new expanded SEAs. Notably, additional exemptions to the SEA review process have been added, and many activities would not be required to be reviewed by Significant Ecological Areas Technical Advisory Committee (SEATAC), nor would they require a public hearing. The proposed regulations would result in four categories of SEA review: (1) exemptions from SEA review process (no SEATAC review, no public hearing), (2) Director's Review (no SEATAC review, no public hearing), (3) Minor Conditional Use Permit (CUP) (no SEATAC review, sometimes a public hearing is required), and (4) CUP (with SEATAC review and public hearing).

WCCA concurs with the comments made by the Santa Monica Mountains Conservancy in a June 14, 2004 letter, that a community-level Biological Constraints Analysis must be required for all development projects requiring grading of more than 5,000 square feet (sq. ft.) within SEAs. This is more consistent with current requirements (as stated in County of Los Angeles Department of Regional Planning Biological Constraints Analysis Guidelines, p. 1, from the County website). This is a key step as part of a proactive approach to adequately protect SEAs. This should be required for all projects grading over 5,000 sq. ft. of surface area within SEAs, even those proposed to be exempt from SEA review (see below).

WCCA also concurs with the comments made by the Santa Monica Mountains Conservancy that additional types of projects in SEAs should undergo SEATAC review, and should be available for public comment, than those currently proposed in the SEA Regulatory Review Procedures. Alternately, the thresholds for exemptions and related categories should be made more rigorous, as described in more detail below.

*SEA exemptions (no SEATAC review, no public hearing):* Under the SEAs Proposed Regulatory Changes, some exemptions would include new individual single-family homes, grazing, vegetation removal less than one acre (provided that no more than one acre is removed within a single calendar year), and grading of slopes less than 8 percent (provided that no more than 2,500 cubic yards of earth is moved).

There are uncountable scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts, either individually, or cumulatively, without adequate avoidance, mitigation, or public review. There are cases where a new single-family home may be proposed in a visually sensitive area (e.g., visible from scenic roads, trails, parkland, etc.), resulting in significant adverse project-related impacts, or resulting in significant, adverse cumulative impacts from several single-family homes being built in the area. Also, extensive grazing over a large area, can result in significant degradation to native plant communities and sensitive species. Vegetation removal of one acre per

year over several years, can also result in significant loss of native habitat and watershed protection. These types of activities can be particularly problematic if the development and vegetation removal occur in sensitive habitat areas near water sources used by wildlife (such as mammals), or near a habitat linkage chokepoint. The proposed new regulations would let such projects through like a super-coarse sieve.

These procedures also state that projects on parcels located partially within an SEA (provided the development area is outside of the SEA) are exempt. It appears this may allow fuel modification and other harmful indirect effects on the SEA without consideration of simple avoidance alternatives that would be obvious from a constraints report.

The SEAs Proposed Regulatory Changes document states that several of these activities are not subject to a building or grading permit, thus are not under the scrutiny of zoning review. WCCA recommends that the County require SEATAC review for these activities. However, if the County proceeds with considering these activities exempt, then at the very least, the following changes should be made to the SEA exemption procedure. As stated above, a biological constraints analysis should be prepared for all of these aforementioned activities resulting in grading of over 5,000 sq. ft. of surface area within SEAs. The proposed exemptions should be modified as follows:

- New single-family residences, that will result in less than 5,000 square feet of surface area grading....
- Projects on parcels partially within a SEA, provided the development area (including the fuel modification areas) is outside of the SEA, the applicant proposes and commits to implement measures to minimize indirect effects to the SEA, and the County biologist has approved these measures.
- Grazing of horses...provided that the grazing and corrals occupy less than ½ acre.
- Vegetation removal less than one ½ acre total, provided that no more than one acre is removed within a single calendar year (in all years combined on a single property)...
- Grading of land with a slope of less than 8 percent provided that no more than 2,500 1,000 cubic yards of earth is moved.

WCCA recommends that at the very least the County biologist review these projects to ensure compliance with the exemption requirements.

*SEA Director's Review (no SEATAC review, no public hearing):* According to the SEAs Proposed Regulatory Changes, a "Director's review" would consist of a site visit by the County biologist, review of a checklist, and the possibility for recommended changes by the biologist, and/or recommendation to the Minor CUP process (which also does not

require SEATAC review). These types of activities would have greater impacts than those proposed under the exemption category, and they have the potential for significant, adverse environmental impacts, individually and cumulatively. WCCA recommends that these activities listed in this paragraph be subject to SEATAC review and that the public be afforded the opportunity to comment. If the County elects to maintain these activities in this SEA Director's Review category (with no SEATAC review and no public hearing), at the very least, the following changes should be made:

- Grading of land with a slope of less than 8 percent and over ~~2,500~~ 1,000 cubic yards but less than ~~5,000~~ 2,500 cubic yards of earth of moved.
- Vegetation removal of ~~1.0 to 2.5~~ ½ to 1.0 acre...

Also, on the checklist for those projects in the SEA Director's Review category, all streams, not just United States Geological Survey (USGS) blue-line streams, should be considered.

*Minor CUP (no SEATAC review, sometimes a public hearing is required):* The Minor CUP process would require certain Development Standards Applicable to Small Subdivisions and a Burden of Proof to be met, with no SEATAC review required. WCCA concurs with the Santa Monica Mountains Conservancy and *strongly* recommends that all small subdivisions (4 units or less) within SEAs be required to be subject to SEATAC review, and that the public be afforded the opportunity to comment. The other activities proposed in this category should also be subject to SEATAC review, including relocation of two or more property lines between three or more contiguous parcels; grading under certain conditions, and vegetation removal under certain conditions. However, if the County proceeds with considering these activities under the proposed Minor CUP process, at the very least, the following changes should be made to the thresholds for this category, to the Development Standards Applicable to Small Subdivisions, and to the Burden of Proof.

If the County elects to maintain these activities in this category, the following changes should be made to the thresholds for this category:

- Grading of land with a slope of 8 percent or greater, but less than ~~25~~ 15 percent in an amount between ~~5,000~~ 2,500 cubic yards and ~~40,000~~ 5,000 cubic yards.
- Vegetation removal greater than ~~2.5~~ 1 acres but less than 20 percent of gross project area, or vegetation removal greater than 1 acre, but less than 2.5 acres....

Additional specificity is warranted for the phrases: "...maintain the remaining portions of the site in a natural undisturbed site..." (in 1.a. Development Standards Applicable to Small Subdivisions, p.8), and "...setting aside appropriate and sufficient undisturbed areas..." (in

2.a. Burden of Proof, p. 9). The following language should be added to these two sections:

This shall be accomplished by dedicating the land in fee simple to an appropriate public entity capable of managing open space for resource protection and recreational use, or by granting conservation easements, or recording a offer to dedicate conservation easements, to the County and to an appropriate public entity capable of managing open space for resource protection and recreational use, prior to vegetation removal or grading.

In 1.c. Development Standards Applicable to Small Subdivisions, the language appears to allow development of a majority of the floodplain or stream, as long as a small portion is not altered. This language should be clarified so as to emphasize avoidance of the majority of the floodplain or stream. From a financial investment standpoint, it seems illogical to build in the floodplain. Also, avoidance of streams is preferred to protect the biological functions and values of the stream. This language should be changed as follows:

Not alter, grade, fill or build within the ~~entire extent of the~~ hydrological floodplain or biological margins of a river corridor, a blue line stream, or other perennial or intermittent watercourse to reduce the need for bank stabilization, unless no other alternative is feasible, the floodplain and watercourse have been avoided to the maximum extent, and appropriate mitigation measures will be implemented.

The proposed 100 foot buffer around wetland areas is not sufficient (1.d. Development Standards Applicable to Small Subdivisions, p. 8) to protect functions and values of the wetland. A buffer of 200-300 feet is more appropriate given the sensitivity of wetlands and the typical buffer recommended by the California Department of Fish and Game.

*CUP (with SEATAC review and public hearing):* The SEA Regulatory Review Procedures for CUPs (including SEATAC review), should provide the highest level of protection because presumably these activities could potentially result in the greatest impacts to the SEAs. Key protections should be added to Section 2. Burden of Proof (p. 11). Additional specificity regarding land dedications and conservation easements should be added to the language in Section 2.a., "...setting aside appropriate and sufficient undisturbed areas..." The language regarding land dedications and conservation easements proposed above for the Burden of Proof for Minor CUPs should be added to the requirements for CUPs.

Specific development standards and conditions to lessen potential biotic impacts to the site in the CUP process for SEAs are not proposed in the SEAs Proposed Regulatory Changes because they are proposed to be developed through the SEATAC process (see p. 11 of the SEAs Proposed Regulatory Changes). These standards and conditions for the CUP process should be more protective than those proposed for the Minor CUP process. For example, the proposed protections relating to wildlife-permeable fencing (1.e., f. of

Development Standards Applicable to Small Subdivisions, p. 9 ) from the minor CUP process should be incorporated into the CUP process.

Also, several changes should be incorporated into the Burden of Proof for the CUP process in SEAs. A requirement should be added to the Burden of Proof for CUPs (Section 2.a., p. 11) so that access roads are designed to minimize disturbance and avoid and minimize impacts to sensitive resources. Also, "... protect habitat linkages and protect movement corridors" should be added to end of Section 2.e., Burden of Proof for CUPs, regarding preserving habitat connectivity. In addition, buffers of 200-300 feet to wetlands and streams should be a requirement in Section 2.d. Burden of Proof for CUPs.

*Specific comments on Puente Hills SEA:* WCCA supports the specific considerations for the Puente Hills SEA (p. 15, Draft SEA Regulatory Framework). County staff will refer to those considerations when reviewing applications for minor CUPs and CUPs in SEAs.

In the Draft Significant Ecological Area Puente Hills document provided on the County's website, the following language should be added to the end of the section entitled Wildlife Movement (p. 4):

Two wildlife movement chokepoints exist within the corridor, at Harbor Boulevard and at the Tonner Canyon at State Route 57. If one of these chokepoints is compromised, the ecological viability of the remaining corridor may be compromised.

Also, these two chokepoints should be mentioned in the second bullet under Puente Hills SEA, in Section III. Specific Considerations for Individual SEAs (p. 15, Draft SEAs Regulatory Framework).

WCCA reiterates those comments in WCCA's previous letters regarding modifications to the SEA boundaries. Notably, areas 5 (southeast of Shea Homes) and 6 (oil field east of Harbor Boulevard) identified in WCCA's April 30, 2001 letter should be added to the Puente Hills SEA. These areas support coastal sage scrub, a very threatened plant community, and coastal California gnatcatcher, a bird species listed as threatened by the United States Fish and Wildlife Service.

### **Conservation/Open Space Element**

It is critical to add the following policy to the Conservation/Open Space Element (e.g., after Policy O-6.3) to ensure adequate protection of SEAs, given the potential for significant adverse environmental impacts from developments in SEAs.

Proposed developments in SEAs shall include mitigation for unavoidable

impacts to SEAs from the removal, conversion, or modification of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

Similar to proposed policies O-10.8 and O-12.1, which address recreational opportunities and watershed protection, the following policy should be added after Policy O-5.4 to promote proactive conservation efforts to protect sensitive biological resources:

Pursue and encourage public and/or private funding for the purchase of parcels and/or conservation easements within SEAs to preserve significant ecological resources.

The County is not in the position of advocating development; rather the County responds to and regulates development proposals. Policy O-5.1 should be amended to read: "Advocate Restrict development that is ~~highly compatible with~~ compromises biotic resources."

Policy O-5.3 addresses maintaining the integrity of the County's diverse plant communities. Other sensitive and declining plant communities, including coastal sage scrub and native grasslands, should be considered in this policy, in addition to those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game.<sup>1</sup> It has been estimated that about 70-90 percent of the presettlement coastal sage scrub in southern California has been destroyed mostly by residential development.<sup>2</sup> Coastal sage scrub also supports a suite of sensitive wildlife and plant species. With respect to native grassland, it has been estimated that there has been about 99 percent loss of native grassland in California.<sup>3</sup>

Policy O-6.3 for SEAs should be amended as follows: "Site roads and utilities to avoid sensitive critical habitat areas or migratory paths." If "critical" habitat is retained, this may appear to limit the analysis to only habitat designated by the United States Fish and Wildlife Service as "critical habitat," when other areas also provide significant habitat values.

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<sup>1</sup> See sensitivity rankings, "Sensitivity of Top Priority Rare Natural Communities in Southern California," determined by the California Department of Fish and Game.

<sup>2</sup> As cited in Noss et al. 1995

<sup>3</sup> Kreissman 1991, as cited in Noss et al. 1995

The following language should be added to Policy O-6.3 for SEAs, and this policy should also be added to the Circulation Element:

Site roads to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as roadkill) during continued operation of existing roadways and construction of new and expanded roadways.

The following policy should be added after Policy O-5.4: "Develop and maintain a detailed database of mitigation sites, conservation easements, and publicly-owned open space, etc." This effort would help provide accurate land use and zoning categories. Also, this information would help County planners when analyzing potential impacts of future developments on existing protected open space.

The General Plan should show where potential habitat linkages remain to connect large regional open space areas. These areas must receive special wildlife corridor designation in the General Plan.

WCCA supports Policy O-10.9 which states in part "[a]dvocate development of... equestrian, biking and hiking trails..." The following policy should be added after Policy O-10.9: "Where feasible and consistent with public safety and operational uses, encourage joint use for public access on infrastructure access roads, and under utility lines."

WCCA supports Policy O-8.1, which states:

Protect the visual quality of scenic hillsides, including but not limited to ridgelines, hillside slopes and natural vegetation, to preserve the integrity of existing terrain—particularly areas located at key vantage points from public roads, trails and recreation areas.

## Land Use Element

WCCA supports the intent of Policy L-2.2 and Policy L-3.1. Notwithstanding, WCCA supports the recommendation by San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy to make the following wording changes in these policies:

Policy L-2.2: Promote designs that preserve ~~significant~~ plant and animal habitats, natural scenery—including hillsides and ridgelines—cultural sites, public parklands and open space.

Policy L-3.1: ~~Promote~~ Establish improved inter-jurisdictional coordination of land use and transportation policy matters between the county, cities,

adjacent counties, special districts, and regional and subregional agencies.

The following policy should be added to the Land Use Element after Policy L.2-11:

Require that it be demonstrated in development applications that developments are consistent with existing adopted plans including trails plans, parks plans, watershed plans, and river master plans.

### **Housing Element**

Similar to the policy proposed for the Santa Monica Mountains (Policy H-5.8.A), the following policy should be added: "Puente-Chino Hills: Limit housing due to the widespread presence of natural hazards, valuable natural resources."

### **Circulation Element**

WCCA supports Goal C-6, and associated policies. This goal is a scenic highway system that preserves and enhances natural resources within its corridors while serving the public through various transportation modes and access to recreational opportunities.

Goal C-1 should be amended to read:

A balanced, multi-modal transportation system, coordinated with established and projected land use patterns, to serve the mobility needs of residents and commerce and improve air and water quality, and protect natural resources.

The following policy should be added to the Circulation Element, after Policy C-1.6:

Site roads and utilities to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as roadkill) during continued operation of existing roadways and construction of new and expanded roadways.

WCCA notes that two major highways are proposed through existing parkland within the Whittier-Puente-Chino Hills in the main document, Shaping the Future 2025. One appears to connect 7<sup>th</sup> Avenue to Turnbull Canyon Road in the Whittier Hills, and the other appears to connect Asuza Avenue with Harbor Boulevard. In the County's Staff Proposed Changes as of June 17, 2004 from the County's website, these two are proposed to be deleted. WCCA supports the exclusion of these two proposed roads

### **Safety Element**

Policy S-3.2 should be expanded to emphasize avoidance of fuel modification practices

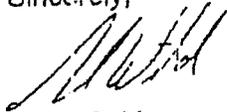
County of Los Angeles  
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Page 10

within public parklands. The following underlined language should be added:

Promote fuel modification practices that balance safety with natural habitat protection and that help reduce the risk of damaging runoff and erosion. For new developments adjacent to parklands, site and design developments to allow required fire-preventative brush clearance to be located outside park boundaries, unless no alternative feasible building site exists on the project site and the project applicant agrees to pay for required fuel modification within the parkland. Maintain a natural vegetation buffer of sufficient size between the necessary fuel modification area and public parkland.

WCCA appreciates the opportunity to comment. Please direct any questions or future documents to Judi Tamasi of our staff at (310) 589-3200 ext. 121 and at the above address.

Sincerely,



Steve Feld  
Chairperson

#### Literature cited

Kreissman, B. 1991. California, an environmental atlas and guide. Bear Claw Press, Davis, Calif.

Noss, R.F., E.T. LaRoe III, and J.M. Scott. 1995. Endangered Ecosystems of the United States: A Preliminary Assessment of Loss and Degradation. U.S. Department of the Interior, National Biological Service, Biological Report 28. February

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# WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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December 20, 2002

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County of Los Angeles  
Department of Regional Planning  
Attn: Mark Herwick,  
320 West Temple Street  
Los Angeles, California 90012

## Comments on Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan

Dear Mr. Herwick:

The Wildlife Corridor Conservation Authority (WCCA) has reviewed the Notice of Preparation (NOP) and Initial Study (IS) for Comprehensive Update and Amendment to the Los Angeles County General Plan (Project No. 02-305). In letters dated April 30, 2001 and May 2, 2001 (enclosed), WCCA commented on the November 2000 Los Angeles County Significant Ecological Areas Update Study (PCR Services Corporation, *et al.* 2000a, 2000b, 2000c), "SEA Update Study." WCCA requests you consider incorporating into the General Plan WCCA's comments provided in these previous letters.

As stated in these previous letters, WCCA commends the County and its consultants on the excellent work done for the update of the Significant Ecological Areas (SEAs). Specifically WCCA complements the County's and consultants' efforts to propose more inclusive and biologically sound boundaries to ensure sustainability of the SEAs. This is evident in the proposed Puente Hills SEA as shown on Figure 4 of the NOP/IS, Existing and Proposed Significant Ecological Areas.

The scale of Figure 4 does not enable us to definitively determine whether all of WCCA's recommendations for inclusion in the Puente Hills SEA have been incorporated. It does appear that some areas that WCCA recommended for inclusion into the Puente Hills SEA were not included, according to Figure 4 of this NOP/IS. Specifically, WCCA recommends that two areas located east of Harbor Boulevard be included in the Puente Hills SEA (see Areas 5 and 6 described in WCCA's April 30, 2001 letter). We look forward to reviewing more detailed maps of the Puente Hills SEA in the Environmental Impact Report for the General Plan Update and Amendment. Area 5 forms an entrance to a small canyon which is a critical wildlife link and the area is core habitat of the western Puente Hills. Area 6 is a buffer for a canyon

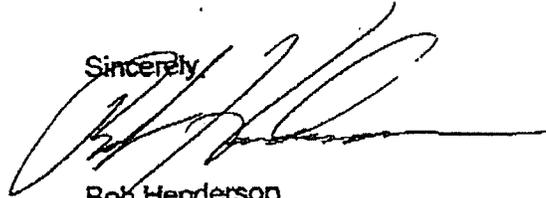
Mark Herwick  
LA County NOP for General Plan Update and Amendment  
December 20, 2002  
Page 2

which forms a critical wildlife link south of Shea Homes, across Harbor Boulevard. Area 6 may also support the coastal California gnatcatcher, listed as threatened by the U.S. Fish and Wildlife Service.

WCCA also strongly supports the general recommendations for implementation and land use practices for SEAs, as well as the specific recommendations for management practices for the proposed Puente Hills SEA in the SEA Update study, with modifications based on WCCA's May 2, 2001 letter on the SEA Update Study.

Thank you for the opportunity to comment. Please contact Judi Tamasi of our staff at (310) 589-3230 ext. 121 if you have any questions.

Sincerely,



Bob Henderson  
Chair

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000a. *Biological Resources Assessment of the Proposed Puente Hills Significant Ecological Area*. Prepared for: Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. *Executive Summary of the Proposed Los Angeles County Significant Ecological Areas*. Prepared for: Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000c. *Los Angeles County Significant Ecological Areas Update Study 2000 Background Report*. Prepared for: Los Angeles County Department of Regional Planning. November.

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## Supplemental Comments on Los Angeles County Significant Ecological Areas Update Study

Dear Mr. Malone:

The Wildlife Corridor Conservation Authority (WCCA) offers the following comments on the Significant Ecological Areas Update Study documents prepared by the consultant team for the County of Los Angeles (County) (PCR Services Corporation *et al.* 2000a, 2000b, 2000c). This letter supplements our comments regarding the boundaries of the Puente Hills Significant Ecological Area (SEA) submitted in our April 30, 2001 letter. To reiterate from our previous letter, we commend the County and their consultants on the excellent work done for the SEA Update Study, including the consultants' efforts to propose more inclusive and biologically sound boundaries. We provide the following additional comments pertaining to the County's procedures for identifying and protecting SEAs within the County.

### Identification and Management of Core Areas Within SEAs

Whether before or after the County adopts new SEA boundaries, WCCA recommends that SEAs be further evaluated to identify core areas that are absolutely essential for protecting critical plant and animal resources. In addition, corridors between core habitats must also be identified. The width of these movement areas must be based on actual monitoring of wildlife movement and on the biological needs of the target species they are intended to support. At the very least, these movement areas should be at least 600 feet wide. Critical riparian areas should include buffers at least 300 feet wide on each side from the stream edge of California Department of Fish and Game streambed jurisdiction. WCCA is pleased to assist in establishment of core areas for the Puente Hills SEA.

Future developments should not be permitted within core SEAs, because of the extreme importance of these areas to species using them. If the County chooses not to define core habitat zones, then future development should not be permitted in any area of the SEA unless certain conditions are met. Development should only be allowed in the SEA if the potential developer has fully mapped the biological resources and wildlife movement corridors within and adjacent to the proposed area of development and it has been demonstrated that the sensitive biological resources and wildlife movement corridors will be protected.

### Management Within SEAs

WCCA concurs with limiting development to no more than 20 percent of the SEA, as proposed in the Background Report (PCR Services Corporation *et al.* 2000c; p. 29). (The SEA boundaries should be defined by those boundaries proposed in the Update Study documents and expanded based on comments received during the public review process). This 20 percent should include existing developed parcels, and should include fuel modification zones required for developments.

We strongly support the general recommendations for implementation and land use management practices, beginning on page 26 of the background report, and the specific recommendations for the proposed Puente Hills SEA on page ES-76 of the Executive Summary (PCR Services Corporation *et al.* 2000b, 2000c), with the modifications proposed in this letter. Reservoirs should be identified as an incompatible use with respect to SEA resources and should be excluded from SEAs.

Mitigation developments approved in SEAs or other sensitive areas should include setting aside or purchasing lands within the SEAs, prioritizing those lands within the core SEA areas.

### SEATAC's Role in Protection of SEAs

We recommend greater involvement by the Significant Ecological Areas Technical Advisory Committee (SEATAC) in zoning matters that affect SEAs. More specifically, SEATAC recommendations need to be highlighted in County staff reports. In addition, SEATAC recommendations must hold more weight in the Environmental Impact Report alternatives process.

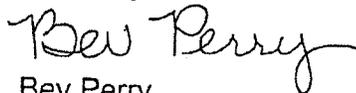
### Application of Criteria to SEAs

In reviewing the consultant's recommendations, WCCA believes that criterion 1, pertaining to habitat of "core populations," has been applied inappropriately. The Puente-Chino Hills supports breeding populations of federally listed species such as the coastal California

gnatcatcher (*Poliioptila californica californica*) near the northwest edge of its range (Cooper 2000) and in the background report, a core population is defined as "a known and/or a viable population" (PCR Services Corporation *et al.* 2000c; p. 11). However, in the SEA Update Study, it was concluded that this criterion was not met. We believe that, given the rate of extinctions occurring among the indigenous species of southern California, no area containing breeding populations of such species should be excluded from the SEA program.

Thank you for allowing us to submit these supplemental comments after the identified deadline in order to accommodate the schedule of our Governing Board. WCCA welcomes the opportunity to work with the County in our mutual efforts to preserve the Puente Hills SEA. Please direct any questions and correspondence to Judi Tamasi of our staff at (310) 589-3200 ext. 121.

Sincerely,



Bev Perry  
Chairperson

#### Literature cited

- Cooper, D.S. 2000. Breeding landbirds of a highly threatened open space: the Puente-Chino Hills, California. In: *Western Birds* 31:213-234.
- PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000a. *Biological Resources Assessment of the Proposed Puente Hills Significant Ecological Area*. Prepared for: Los Angeles County Department of Regional Planning November.
- PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. *Executive Summary of the Proposed Los Angeles County Significant Ecological Areas*. Prepared for: Los Angeles County Department of Regional Planning. November.
- PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000c. *Los Angeles County Significant Ecological Areas Update Study 2000 Background Report*. Prepared for: Los Angeles County Department of Regional Planning. November.

# WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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April 30, 2001

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## Comments on Los Angeles County Significant Ecological Areas Update Study, Proposed Puente Hills SEA

Dear Mr. Malone:

The Wildlife Corridor Conservation Authority (WCCA) has reviewed the Significant Ecological Areas Update Study documents prepared by the consultant team for the County of Los Angeles (County) (PCR Services Corporation *et al.* 2000b, 2000c), including the Biological Resources Assessment of the Proposed Puente Hills Significant Ecological Area (PCR Services Corporation *et al.* 2000a). The following comments were adopted by our Governing Board at our March 7, 2001, meeting. Please note that as we previously indicated in an email to you, we will submit additional comments on the SEA Update Study after WCCA's next Governing Board meeting of May 2, 2001.

For the Significant Ecological Areas (SEA) program, the County of Los Angeles (County) is revising existing SEA boundaries and regulatory policies as part to the General Plan update effort. The objective of the SEA program is to preserve biotic diversity in the County, and this objective has been expanded to include the future sustainability of this diversity through the application of more current practices in conservation biology, primarily by consolidation into larger interconnected SEAs (PCR Services Corporation *et al.* 2000b). The proposed acreage of the consolidated areas has been substantially increased compared to the SEAs previously designated in the 1980 County General Plan.

WCCA commends the County and its consultants on the excellent work done for the Significant Ecological Areas Update Study and specifically on the consultants' efforts to propose more inclusive and biologically sound

boundaries to ensure sustainability of the SEAs. This is evident in the proposed Puente Hills SEA.

WCCA offers the following recommendations to fine-tune the proposed Puente Hills SEA. Our staff is available to work with the County and other interested parties to reach a resolution of these issues. The majority of these suggestions reflect the boundaries we proposed in our May 1, 2000, SEA nomination submittal. The following numbered comments correspond to the enclosed maps. These maps also depict portions of our original recommended boundaries. At times, it was difficult to verify the specific proposed SEA boundaries based on the scale of the mapping in the SEA reports. As such, we did our best to estimate the boundaries proposed in the SEA Update Study.

Wildlife Corridor Conservation Authority's Recommendations for Modifications to Proposed Puente Hills Significant Ecological Area		
Area Number (see enclosed maps)	Location/Description	Recommendation and Rationale
1	Puente Hills Landfill. South of 60 Freeway, east of 605 Freeway	Include. Good habitat is present on the east and north side of property. Links to San Jose Creek and Whittier Narrows. Landfill will be closed and habitat value of landfill area will be determined in final closure plan.
2	Savage Canyon/ Worsham Canyon	Include. Good habitat value in Savage Canyon and lower Worsham Canyon.
3	North end of Mallas Property	Include. Land owned by Puente Hills Landfill Native Habitat Preservation Authority. Good habitat value.

Los Angeles County Proposed Puente Hills SEA Comments

April 30, 2001

Page 3

4	Water tank area west of Powder Canyon and north of Reposado Drive	This area is a restricted corridor area. Corridor width must be maximized here. It is difficult to verify the exact location of the proposed SEA in this area. If an area around the water tank that was proposed by WCCA is not included in the proposed SEA, WCCA recommends including it.
5	Land southeast of Shea Homes	Include. This area forms the entrance to a small canyon which is a critical wildlife link and the area is core habitat of the western Puente Hills.
6	Oil field east of Harbor Boulevard	Include. This area is a buffer for a canyon which forms a critical wildlife link south of Shea Homes across Harbor Boulevard.
7	57 Freeway Corridor	SEA could exclude freeway but should include Brea Creek. The SEA should include land up to and excluding California Department of Transportation right of way to assure protection for Brea Creek. However, this should not include already deeded or entitled land within the City of Diamond Bar.
8	Southern boundary of Diamond Bar	It appears developed areas of Diamond Bar may have been included in the proposed revision (near 57 Freeway). These should be excluded and this boundary immediately adjacent to Diamond Bar should conform to boundary of existing SEA 15.
9 (Not shown on enclosed maps)	Part of City of Diamond Bar	The northern boundary of the proposed Puente Hills SEA east of the 57 Freeway and west of Los Angeles/San Bernardino County lines near the incorporated City of Diamond Bar should correspond to the existing SEA in this area. It is not necessary to include already deeded restricted open space and developed lands in Diamond Bar in the proposed SEA.

10 (Not shown on enclosed maps)	San Jose Creek and San Gabriel River	The soft-bottomed portions of San Jose Creek and the San Gabriel River, which provide wildlife habitat and potential movement corridors from the Puente Hills to Whittier Narrows and the San Gabriel Mountains, should be included. The specific area of San Jose Creek should include the soft bottom portions from its confluence with the San Gabriel River to approximately 8,000 feet east of the confluence.
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In summary, we commend and support the County and their consultants on their progress on the SEA Update Study, and particularly on the proposed Puente Hills SEA. We look forward to working with you to incorporate the above-mentioned suggestions. We will forward additional comments on the SEA Update Study after our May 2, 2001, Governing Board meeting. Please direct any questions and correspondence to Judi Tamasi of our staff at (310) 589-3200 ext. 121.

Sincerely,



Bev Perry  
Chairperson

Enclosures (4)

Literature cited

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000a. *Biological Resources Assessment of the Proposed Puente Hills Significant Ecological Area*. Prepared for: Los Angeles County Department of Regional Planning November.

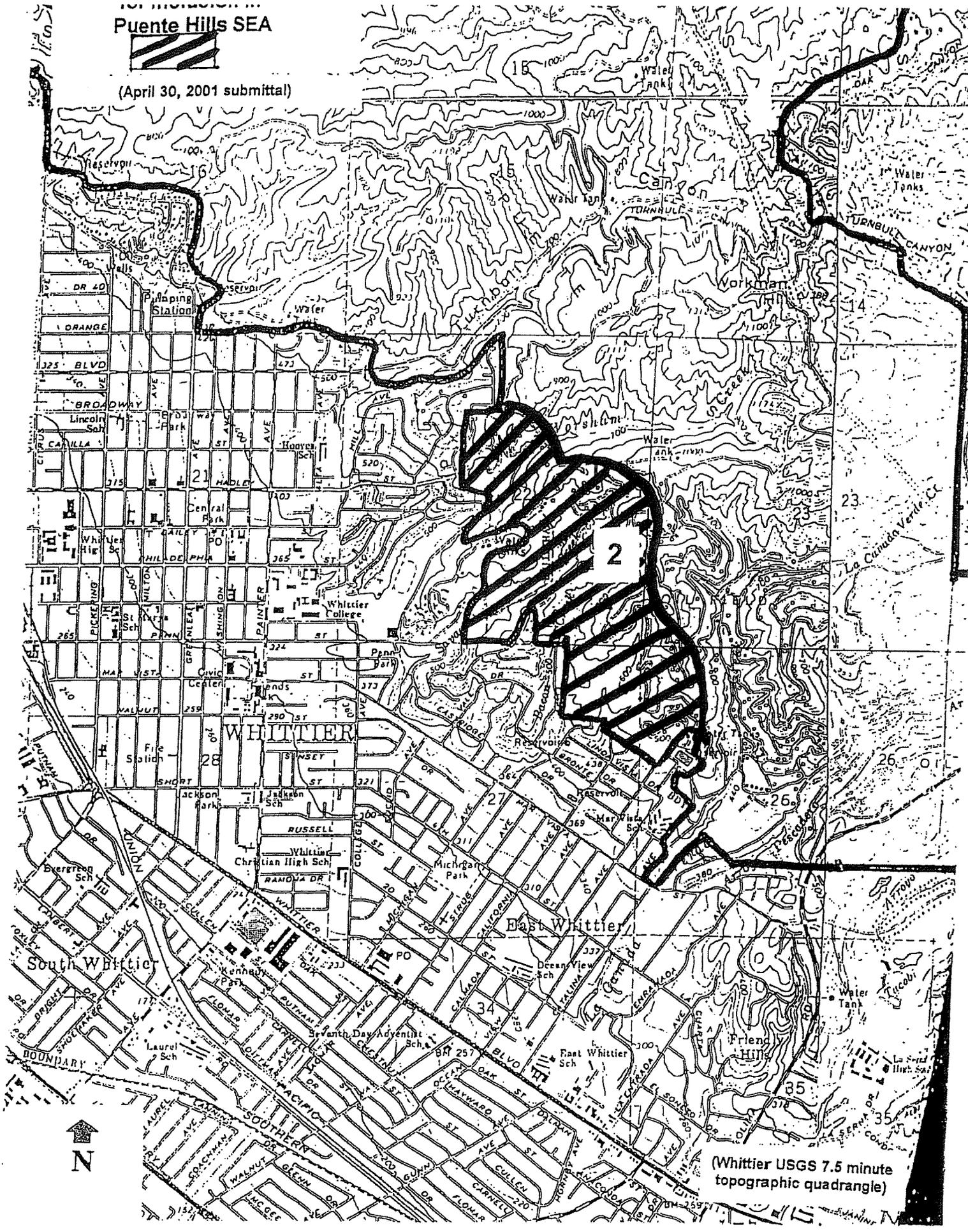
PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. *Executive Summary of the Proposed Los Angeles County Significant Ecological Areas*. Prepared for: Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000c. *Los Angeles County Significant Ecological Areas Update Study 2000 Background Report*. Prepared for: Los Angeles County Department of Regional Planning. November.

FOR INFORMATION IN  
**Puente Hills SEA**



(April 30, 2001 submittal)

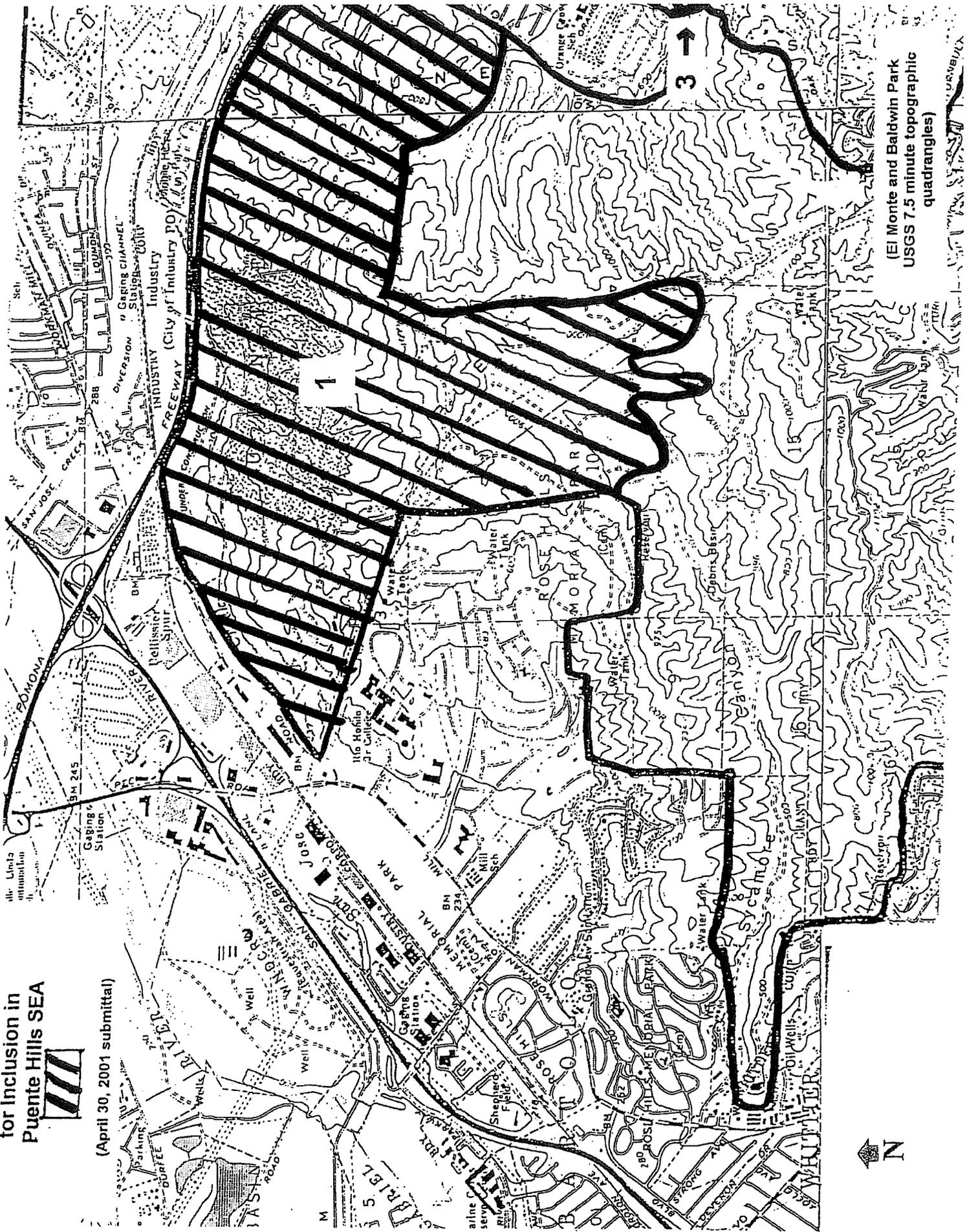


(Whittier USGS 7.5 minute  
topographic quadrangle)

for Inclusion in  
Puente Hills SEA



(April 30, 2001 submittal)

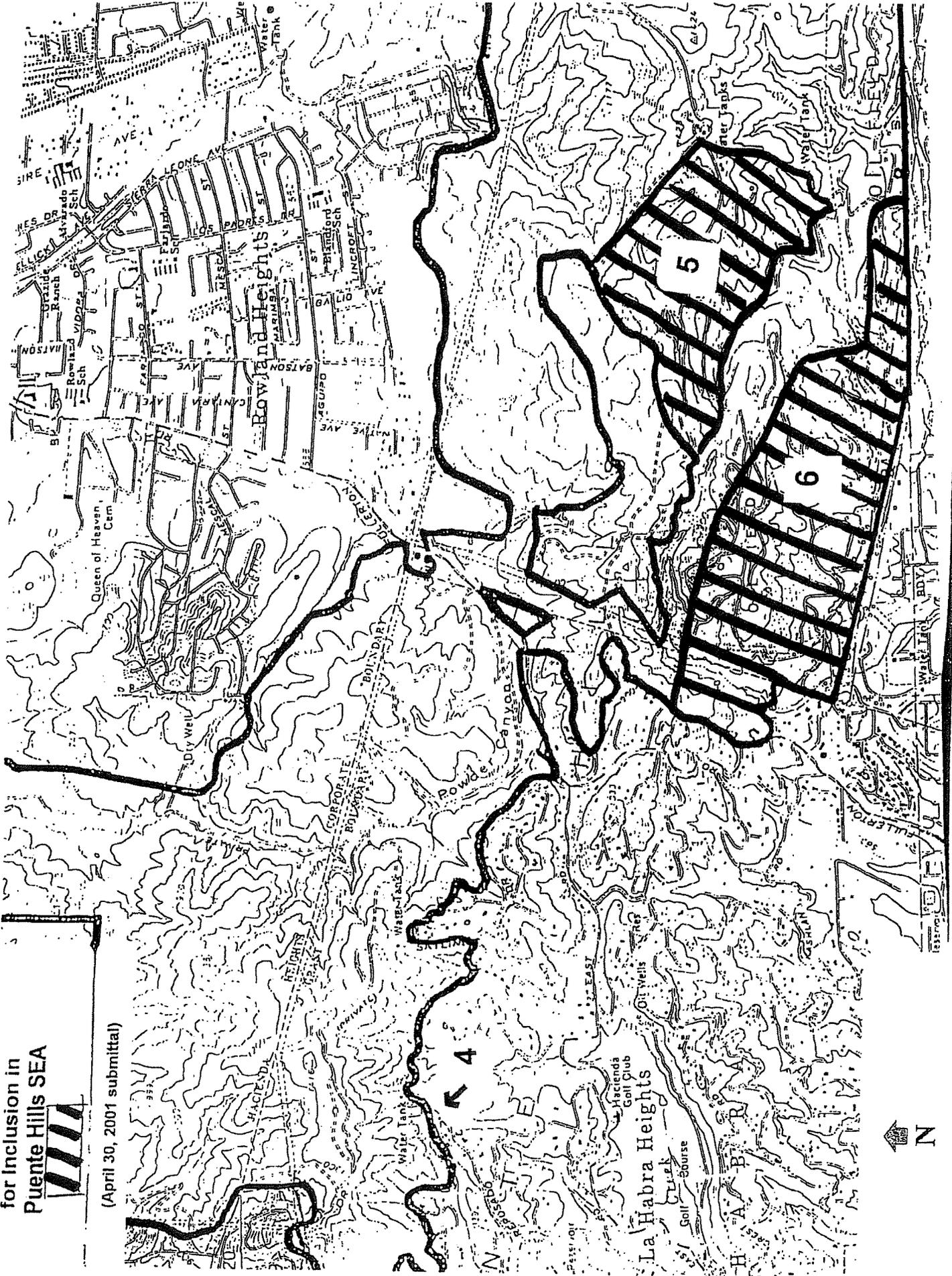


El Monte and Baldwin Park  
USGS 7.5 minute topographic  
quadrangles

for Inclusion in  
Puente Hills SEA



(April 30, 2001 submittal)

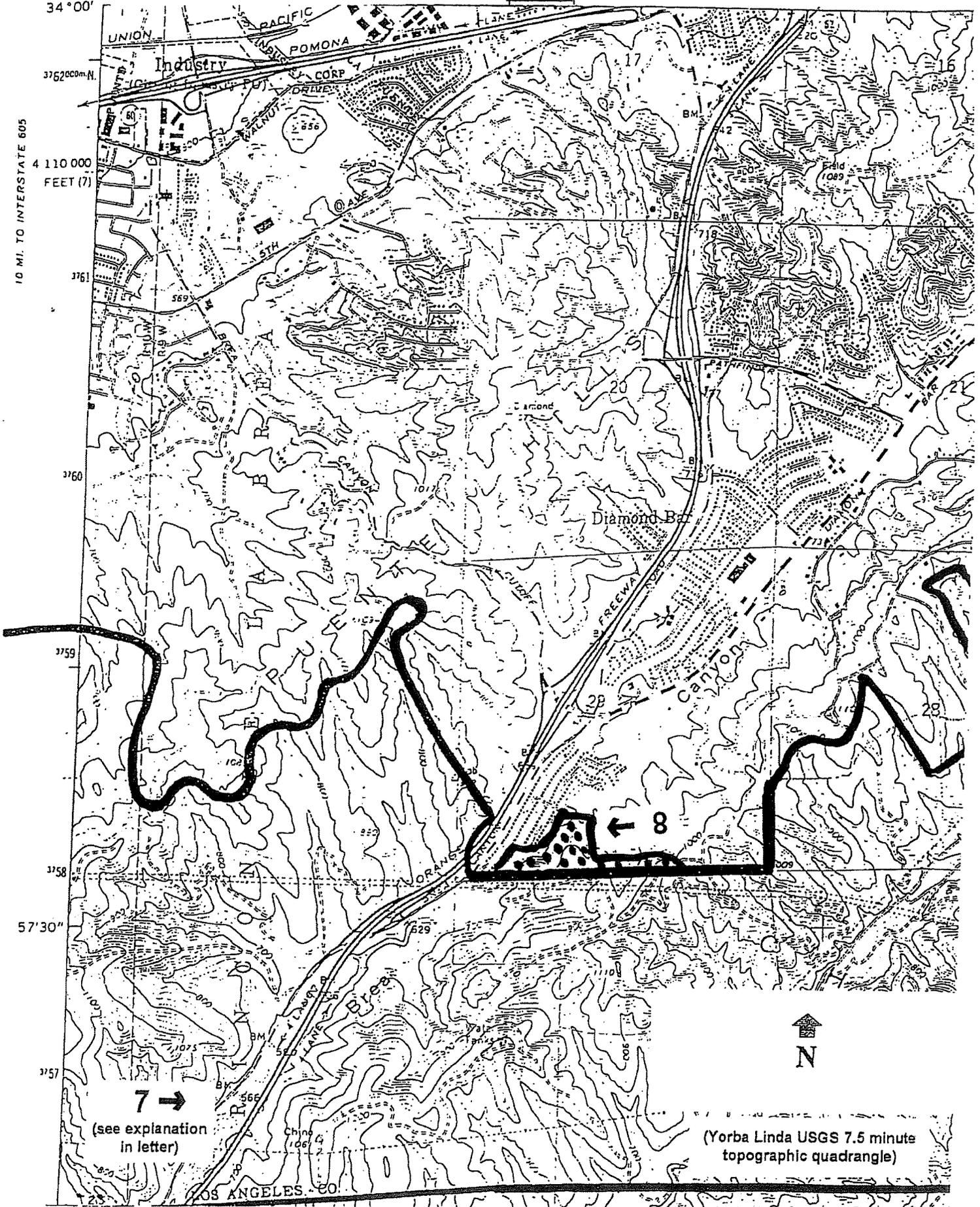


(April 30, 2001 submittal)

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(see explanation  
in letter)



(Yorba Linda USGS 7.5 minute  
topographic quadrangle)



Puente Hills Landfill  
Native Habitat Preservation Authority

August 29, 2007

County of Los Angeles  
Department of Regional Planning  
General Plan Development Section  
Attn: Mark Herwick, General Plan Section Head  
320 West Temple Street  
Los Angeles, CA 90012

**Comments on Draft Los Angeles County General Plan**

Dear Mr. Herwick:

The Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the draft General Plan.

The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to our mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency will endeavor to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority's jurisdiction extends within eastern Los Angeles County approximately from the intersection of the 605 and 60 Freeways in the west to Harbor Boulevard in the east. The Habitat Authority owns and or manages 3,860 acres which lie within the Cities of Whittier and La Habra Heights as well as in the County unincorporated area of the Puente Hills known as Hacienda Heights and Rowland Heights.

**Proposed Puente Hills Significant Ecological Area (SEA) Delineation:**

The Habitat Authority supports in concept the proposed expansion of the Puente-Chino Hills Significant Ecological Area (SEA), and we support our properties being included within the SEA. The County's efforts to propose protection of wildlife habitat as a part of the land use element in the general plan are commendable. In order to maintain the integrity of the scientific work conducted, we recommend that the boundaries of the SEAs proposed by County consultants (PCR 2000) not be reduced even outside of the unincorporated area without further scientific evidence to support that change. In addition, there are several areas for which the biological evidence supports their inclusion within this SEA.



The open space of the Puente Hills between Harbor Blvd. and State Route 57 has been previously shown to be of great conservation concern to the entire Puente-Chino Hills corridor, both for its value in linking the west and east corridor (cite: Missing Middle) as well as because of its intrinsic value in supporting significant populations of sensitive animal species.

The current boundaries of the proposed Puente Hills Significant Ecological Area purport to encompass the significant open space of this portion of the hills, but as currently drawn, they omit a critically-important portion of the open space in unincorporated Los Angeles County: the southwestern corner of the Aera project area, which extends east from Harbor Blvd.

An aerial photo of the area in question is in Figure 1. This shows well the mosaic of habitat dominated by extensive, intact grassland (native/non-native mix), which appears tan in color. Southern California black walnut woodland (dark green) and coastal sage scrub (gray-green, lower right) comprise the other two main habitat types.



Figure 1. "Aera" region of Puente Hills.

The proposed boundaries of the SEA are reproduced in Figure 2 (in green). This configuration clearly excludes the entire southwestern corner of the Aera project area (lower left), which is marked with a red arrow in Figure 3.

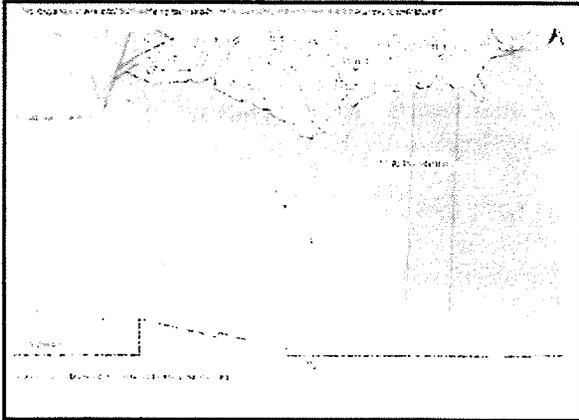


Figure 2. Map of Aera project portion of Puente Hills SEA, from Los Angeles Co. General Plan update.



Figure 3. Red arrow denotes "missing corner" of Aera project area, a region of high-quality habitat currently excluded from coverage. Blue lines show proposed boundaries of SEA

The decision to omit this area from the SEA is puzzling, especially because it exhibits features consistent with the rest of the SEA, and even supports species that are extremely localized and declining region-wide, which are presumably of great conservation concern.

Though the wording of the Los Angeles County General Plan update regarding SEAs is vague ("Conservation and Open Space" section, p. 118), a more detailed definition was provided by PCR (2000), listing six main criteria, of which the Puente Hills met four.

The criteria which it met are also satisfied by the inclusion of the omitted Aera project site, namely:

- Biotic communities, vegetative associations, and habitat of plant or animal species that are either unique or are restricted in distribution (both a, regional and b, county-wide).

- Habitat that at some point in the life cycle of a species or group of species, serves as concentrated breeding, feeding, resting or migrating grounds and is limited in availability.
- Areas that would provide for preservation of relatively undisturbed examples of the original natural biotic communities of Los Angeles.

The breeding bird species of the Puente-Chino Hills were treated by Cooper (2000), who identified three key areas most important for bird conservation in the range; two of these are located in the southwestern Aera region, *including in the portion excluded by the current boundaries*. These include the extensive grassland between Harbor Blvd. and State Route 57, and the coastal sage scrub of north Brea/west Yorba Linda.

The extensive grassland of the Aera site is unique in the Puente Hills; no other comparably large grassland remains in the Los Angeles Basin. Therefore, it is extremely important for grassland obligate species such as White-tailed Kite, Grasshopper Sparrow, and others. Despite the admixture of non-native grasses in the system, this habitat is very robust, and supports countless patches of native species, even where grazed.

The coastal sage scrub along the southeastern corner of the Aera site is an extension of what is arguably the highest-quality stand of this habitat in the entire Puente-Chino Hills, that along the northern border of the City of Brea (Orange Co.). This habitat, which also includes extensive Cactus Scrub, was found to support a robust population of the Federally-threatened California Gnatcatcher, among many other sensitive species (see below).

Southern California black walnut woodland, considered a sensitive natural community and wholly restricted to the hills surrounding the Los Angeles Basin, is probably best developed in the eastern Puente Hills (LSA 2007), including the Aera property. Prior to grazing, this habitat was probably more extensive in the "missing" Aera piece.

In a review of the status of sensitive nesting bird species of the hills (Cooper 2000:230-232) identified 18 species considered regionally-declining and at high risk of local extinction along the Puente-Chino Hills Corridor. Most of these are found within this Aera portion of the hills, including some that reach their maximum abundance in Los Angeles County here.

Notable among these are the following species:

**Northern red diamond rattlesnake *Crotalus ruber ruber***

**California Reptile Species of Special Concern**

This animal reaches the northern global extent of its range in south-facing slopes of the Whittier Hills (Haas et al. 2002), and the Aera site presumably supports this taxon, as it occurs just to the east above Yorba Linda (pers. obs.).

**White-tailed Kite *Elanus leucurus***

**California Bird Species of Special Concern**

Kites, presumably breeding locally, were a common site during spring/summer surveys in this area in the late 1990s; this species is effectively at the northern edge of its range in the Puente-Chino Hills in the Harbor Blvd. area, with perhaps a single pair to the west (in Powder Cyn.).

**Golden Eagle *Aquila chrysaetos***

**California Bird Species of Special Concern**

The only Golden Eagles observed perched in the Puente-Chino Hills during breeding surveys in 1997-98 were an adult and a juvenile observed in the Aera site, just off the eastern border of the omitted piece. These birds were detected on 24 May 1997, and presumably were the same birds that have been documented nesting near Chino Hills State Park to the east.

**Loggerhead Shrike *Lanius ludovicianus***

**California Bird Species of Special Concern**

The Aera property may represent the last hope for breeding shrikes in the Los Angeles Basin; a recent survey (2005) conducted by the Los Angeles Co. Museum of Natural History (which did not include the Puente Hills) found no breeding pairs, yet two were on the Aera property on 31 May 1997 (Cooper, unpubl. data), suggesting breeding at least then. The habitat - rolling hills with grassland - is ideal for this species.

**California Gnatcatcher *Poliophtila californica californica***

**Federally Threatened**

The largest population of this taxon in the Puente-Chino Hills is in the band of scrub from just east of Harbor Blvd. (incl. the Aera site missing from the proposed SEA), east into Yorba Linda in Orange Co. (visible in gray-green at the lower left of Fig. 3). Several dozen acres of this habitat appears to have been left out of the SEA. This population is presumably the source population for subpopulations farther west along the hills, including several pairs along Arroyo San Miguel (vic. Colima Rd.). Further degradation of the open space between these two groups could have detrimental effects on both populations.

**Southern California Rufous-crowned Sparrow *Aimophila ruficeps canescens***

**California Bird Species of Special Concern**

Very common throughout site (and throughout hills).

**Bell's Sage Sparrow *Amphispiza belli belli***

**California Bird Species of Special Concern**

This California-Baja endemic is known in the Puente Hills only from a single (juvenile) individual observed along the eastern edge of the missing Aera corner on 24 May 1997 (Cooper, unpubl. data). This species is strongly tied to undisturbed coastal sage scrub and Chamise chaparral in our area, and, like the Loggerhead Shrike, may be extremely dependent upon this habitat on the Aera site for its persistence in the Los Angeles area. The nearest Los Angeles County populations are vic. Claremont, along the foothills of the San Gabriel Mtns. (possibly extirpated) and at Castro Peak in the western Santa Monica Mtns.

**Western Grasshopper Sparrow *Ammodramus savannarum perpallidus* California Bird Species of Special Concern**

Known from just a handful of areas in the Puente Hills, this range is arguably the most important site for this species in Los Angeles County. The largest population in the hills by far is located in the grassland between Harbor Blvd. and the 57 Fwy. (20+ birds in 1997, D. Cooper unpubl. data). They would be expected to occur in grassland on the southwestern corner as well. Just west of here, a breeding colony of this species was also present (<5 pr.) in the southeastern portion of Powder Canyon along the Schabarum Trail, and on a grassy ridge just south of Turnbull Canyon. (Skyline Trail).

A major study (Resource Management Plan, Puente Hills Landfill Native Habitat Authority, LSA and Associates 2007) compiled much of the pertinent information on the sensitive wildlife and plants of the Puente Hills within the Habitat Authority's jurisdiction. Notably absent from the proposed boundaries of the SEA is the entire extent of "Core habitat" which was delineated by the Habitat Authority within its Resource Management Plan located west of Colima Rd. This large parcel, now managed by the Habitat Authority, is contiguous to habitat known to support some of the most imperiled species of the Puente Hills, including the federally-threatened California Gnatcatcher and such California species of special concern as coastal populations of the Cactus Wren *Campylorhynchus brunneicapillus*, the latter having suffered widespread extirpations in recent years. These areas should be included within the SEA.

Also, please consider for inclusion other biologically rich lands owned or managed by the Habitat Authority at the top of the Turnbull Canyon watershed. There are several other parcels adjacent to Habitat Authority properties in this area that warrant inclusion into the SEA due to habitat importance (Figure 4). This is an area that was found to support several rare plants, including Plummer's Mariposa-Lily *Calochortus plummerae* and the western spadefoot *Spea hammondi* (described in the RMP). However, the proposed SEA would actually reduce the coverage of this important upper watershed zone. In this case, we recommend that at the least, the existing SEA boundary remain in place.

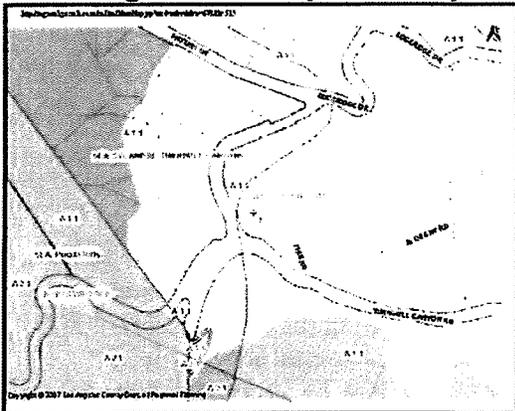


Figure 4. Hacienda Heights Area, showing pale green shaded area formerly included in the Puente Hills SEA.

While in general, the Habitat Authority welcomes the SEA designation over its properties, please consider deletion of the developed area of Sycamore Canyon from the proposed SEA designation. The Habitat Authority is considering installing a small office in between two

existing buildings at this location where there would no impacts to the native landscape or environment. This physical presence would enable us to better manage this and other sensitive habitat areas in the western Puente Hills.

Habitat Authority would welcome the opportunity to meet with County staff to discuss any of these matters in further detail.

**Proposed Puente Hills SEA Description:**

In addition, please note the following changes to the current description for the Puente Hills SEA.

On Page 1 of the Puente Hills Description— Paragraph 4- Please note that there are key regional habitats represented in the Puente Hills such as southern California black walnut woodland.

Page 2, Paragraph 1- Oak woodland is prevalent in the Hacienda Hills as well.

Paragraph 2 - Oak Riparian woodland is not extensive in Powder Canyon. Powder Canyon is a mostly arid drainage that does not have the riparian elements of many other drainages in the hills. The classic oak-willow-sycamore canopy and the dense, herbaceous understory typical of this habitat is absent from most of Powder Canyon.

Paragraph 4 – Please reevaluate the description of willow scrub. It is our understanding that willow scrub has dense understory, composed of Mulefat and Sandbar Willow *Salix exigua*.

Paragraph 5 – Please replace the word "robust" with "high in stature," "high, evergreen" or something else - most habitats have robust species, even non-native grassland.

The western limit of "mixed chaparral" in the Puente Hills extends to about Powder Canyon, and is dominated by the species listed, as well as by Scrub Oak (*Q. berberidifolia*), with subdominants of Chamise, *Cercocarpus*, and *Ceanothus*; Laurel Sumac is uncommon. The chaparral-like habitat prevalent west of Powder Canyon is better termed "sumac scrub", and is dominated by the species listed in the paragraph 5 of page 2; Laurel Sumac, for example, is common and dominant in sumac scrub

Page 2, Paragraph 5 (continued on page 3) - Mixed Chaparral is widespread in the eastern Puente Hills, and Sumac Scrub is widespread in the western Puente Hills - I would not single out individual drainages (Sycamore Canyon, etc.) here.

Page 3, Paragraph 1 - Coastal sage scrub is very robust. Maybe write "short in stature" to distinguish it from chaparral. Please note that cactus scrub forms a very important subunit of coastal sage scrub, and is extensive on southerly and westerly slopes, including Sycamore Canyon, Hellman Park, and the entire La Habra Heights area. These patches represent some of the best examples of cactus scrub in the entire county, and should be noted as such.

Paragraph 2 - Non-native grassland is extensive in three important areas of the Puente Hills; along the Skyline Trail south of Turnbull Canyon, vic. Powder Canyon, and south of Rowland

Heights ("Aera" property). This habitat supports a variety of sensitive plant and animal species (e.g., Catalina Mariposa-Lily *Calochortus catalinae*, Grasshopper Sparrow, Western Spadefoot), and is not degraded as portrayed here.

Paragraph 3 - Freshwater marsh is restricted to the San Bernardino County portion of upper Tonner Canyon, both north and south of Grand Ave. (easily visible from road); no actual freshwater marsh habitat exists within this SEA in Los Angeles Co., though there is substantial freshwater marsh to the west, within Whittier Narrows.

Paragraph 5 - Invertebrates were investigated by LSA (2005), who documented several scarce butterflies, including California Dogface *Colias eurydice*, Western Tailed-Blue *Everes amyntula*, and Mormon *Apodemia mormo* and Fatal *Calephelis nemesis* Metalmarks. These are scattered throughout the hills.

The herpetofauna of this SEA was investigated by Haas et al. (2002) and LSA (2005), who found the hills to support several locally-rare and/or sensitive species, including Western Spadefoot (one recent record vic. Skyline Trail south of Hacienda Hts.), Arboreal Salamander *Aneides lugubris* (Whittier Hills, Powder Cyn.), two species of slender-salamander (*B. nigriventris* and *B. major*; widespread), Coastal Western Whiptail *Cnemidophorus tigris* (widespread), Red Diamondback Rattlesnake *Crotalus ruber* (localized), and Western Blind Snake *Leptotyphlops humilis* (Powder Cyn.).

Page 4, Paragraph 1 - Sensitive mammals (LSA 2005) include the Desert Woodrat *Neotoma lepida* and habitat specialists like the Cactus Mouse *Peromyscus eremicus* (Whittier Hills) and the Western Gray Squirrel *Sciurus griseus* (Powder Cyn.).

The Puente Hills is extremely important for bats, and 11 species were documented here during a recent study (Remington 2006), including such sensitive species as Yuma myotis *Myotis ymanensis*, western red bat *Lasiurus blossevillii*, western yellow bat *Lasiurus xanthinus*, hoary bat *Lasiurus cinereus*, pallid bat *Antrozous pallidus*, pocketed free-tailed bat *Nyctinomops femorosaccus* and western mastiff bat *Eumops perotis*.

Page 4 – Paragraph 2 –The Mountains Recreation and Conservation Authority (a joint powers of the Santa Monica Mountains Conservancy) working with the Wildlife Corridor Conservation Authority commissioned the study of wildlife movement in Puente Hills.

Page 5 - A major study (LSA 2007) compiled much of the pertinent information on the sensitive wildlife and plants of the Puente Hills within the Habitat Authority's jurisdiction. The federally Threatened California Gnatcatcher occurs in at least two areas of the hills, vic. Arroyo San Miguel east of Colima Dr. and a smaller, possibly irregular population along Sycamore Canyon in the western Puente Hills. These represent some of the last locales for this bird in the Los Angeles Basin, and some of the farthest-north individuals of the species.

This range is notable as holding among the last known populations in the Los Angeles area for several taxa that are considered California Species of Special Concern and/or that are nearly extinct locally, and through recent biological monitoring, we are discovering additional

protected species every year, including the federally Endangered Least Bell's Vireo, detected in 2005 and 2007 and possibly rare summer resident. It is not a coincidence that many of these species are grassland or coastal scrub specialists; these habitats have been virtually eliminated in the Los Angeles Basin, but persists in a reasonably intact state in the Puente-Chino Hills (Cooper 2000).

**Proposed SEA Ordinance:**

From time to time the Habitat Authority will propose improvements to the open space such as low impact recreational trailheads, trails, wildlife road underpasses, or fences to limit illegal off-road activity on protected preserve areas. Our intentions with these and similar projects are to design them around the existing biological resources to ensure the resources will continue to function and even flourish. We recommend that open space management activities of this nature be considered as compatible and appropriate within a SEA. More specifically, we recommend that language be added into the SEA Ordinance allowing public land preservation agencies with adopted management plans to carry out all activities that contribute the mission of their agency.

**Circulation:**

In regards to Figure 4.6, Adopted and Proposed Scenic Corridors, we support the existing candidacy of Colima Rd., Hacienda Rd., Harbor Blvd., and the 57 Freeway as scenic corridors. In addition, we support adding Turnbull Canyon Rd., as a proposed scenic corridor.

**Conservation & Open Space Element:**

We commend the County for its efforts in protecting the last remaining open space areas in the Los Angeles Basin. In regards to Figure 5.1, Open Space, we will support the inclusion of the unincorporated Authority owned/managed lands to be designated as Other Park and Conservancy Land. Currently some of the unincorporated properties we own/manage are indicated as such, but not all of them. Please contact the Habitat Authority staff for a map of Habitat Authority owned/managed lands in GIS at your convenience.

In regards to Figure 5.2, Trail Network, missing is the existing Los Angeles County Schabarum Trail through the Puente Hills. Please include this trail and its connector trails, as well as adopted trails of the Habitat Authority which can be designated as Existing Official Trails on Public Lands Trail Network. Please contact the Habitat Authority staff for a map of these trails in GIS at your convenience.

In regards to the Biological Resources: Urban-Wildland Interface (page 123), we recommend that its definition include the following italicized language "...where the edge of the forest *and other publicly owned open space* lands meet development..." The Habitat Authority's adopted Resource Management Plan addresses urban edge issues, and we also have produced a DVD regarding urban edge issues, both intended to protect the Puente Hills' biotic, watershed, aesthetic and recreational resources. Edge issues are not unique to the forest.

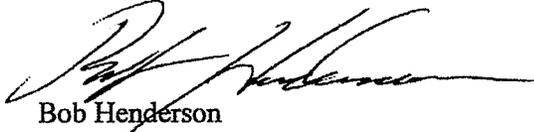
**Safety:**

On page 164, please add to Goal S-2: Coordination with other public agency emergency planning and response activities.

Furthermore, the General Plan should address the issue of compatibility of roadways with wildlife in the Circulation and Conservation and Open Space Elements, not exclusively in the section dealing with Significant Ecological Areas. Issues to address include the restriction of wildlife movement, the increase in wildlife mortality with roadways, and the threat of public safety with vehicular-wildlife collisions. The draft General Plan should include measures such as wildlife underpasses, overpasses, fencing, or signage to address these conditions during the continued operation of existing roadways, for new roadway development, and for other development that would significantly increase traffic on roadways, near natural and wildland areas.

Please add us to the mailing list for the draft General Plan and all associated documents when they are made available for public review. Thank you for your consideration of our comments. Again, we would like to meet with County staff to further discuss these issues at your convenience. Feel free to contact me or Andrea Gullo, Executive Director, at (562) 945-9003 for further discussion.

Sincerely,



Bob Henderson  
Chairman

cc: Board of Directors  
Citizens Technical Advisory Committee

Sources Cited:

Cooper, D.S. 2000. Breeding landbirds of a highly-threatened open space: The Puente-Chino Hills, California. *Western Birds* 31(4):213-234.

Haas, C.D., A.R. Backlin, C. Rochester, and R.N. Fisher. 2002. Monitoring reptiles and amphibians at longterm biodiversity monitoring stations: The Puente-Chino Hills. USGS Western Ecology Research Center. Final report. Sacramento, California.

LSA Associates, Inc. 2005. Dragonfly, Butterfly, and Vertebrate Species Matrix for the Puente Hills Landfill Native Habitat Preservation Authority Lands, Results of Multispecies Surveys and Pitfall Trapping, Irvine, California.

LSA Associates, Inc. 2007. (Draft) resource management plan. Puente Hills Landfill Native Habitat Preservation Authority. (May 2007) July 2007. Irvine, California.

PCR Services Corporation (with Frank Hovore & Associates and FORMA Systems). 2000. Biological resources assessment of the proposed Puente Hills Significant Ecological Area. November 2000. Irvine, California.

Remington, S. 2006. Bat surveys of the Puente Hills. Final report. Costa Mesa, California. July 2006.

**SANTA MONICA MOUNTAINS CONSERVANCY**

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5750 RAMIREZ CANYON ROAD  
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PHONE (310) 589-3200  
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August 30, 2011

Ms. Connie Chung, AICP  
Supervising Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1356  
Los Angeles, California 90012

Ms. Thuy Hua, AICP  
Senior Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1356  
Los Angeles, California 90012

**Notice of Preparation of a Draft Environmental Impact Report  
Los Angeles County General Plan and Antelope Valley Area Plan Updates**

Dear Mses. Chung and Hua:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed both the Los Angeles County Draft General Plan and the Draft Antelope Valley Area Plan. We appreciate the ongoing working relationship with your staff as you write the policies that will guide growth in Los Angeles County for the next generation.

Please find attached two comment letters for inclusion in the scoping for the Draft Environmental Impact Reports for the respective plans. The most recent letter for the Draft General Plan was sent to your department on June 27, 2011 and included previous letters on the subject as attachments. A new letter dated August 29, 2011 on the Antelope Valley Area Plan update is also attached. The Conservancy had not yet received the Notice of Preparation before drafting this letter. We request that all of these referenced materials be included in scoping.

If you have any questions, I can be reached at (310) 589-3200, ext. 128.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Edelman".

PAUL EDELMAN  
Deputy Director  
Natural Resources and Planning

**SANTA MONICA MOUNTAINS CONSERVANCY**

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August 29, 2011

Mr. Mitch Glaser, AICP  
Supervising Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Preliminary Draft Antelope Valley Area Plan**

Dear Mr. Glaser:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State planning agency in the Rim of the Valley Zone, which includes a large portion of the Antelope Valley Planning Area. The Conservancy commends the County for the visionary approach to resource management and land use planning that runs throughout the draft plan. The planning framework that targets growth into existing areas with supporting infrastructure is the *only* sustainable way for the Antelope Valley to grow. In the context of this general support, the Conservancy makes the following specific comments and suggestions.

**Land Use Goals for High Desert Corridor Should be Included in Plan Update**

As stated in the plan, the High Desert Corridor (HDC) promises to transform portions of the planning area. While an exact route has yet to be determined, planning for the HDC is far enough along to develop specific land use and other strategies to mitigate its impacts. The Desert and Mountain Conservation Authority (DMCA), a joint-powers partner of the Conservancy, wrote a detailed letter as part of the HDC project scoping in October of last year (attached). The Conservancy shares DMCA's assessment of the project's potential impacts. Setting aside the merits of the project, the Conservancy believes that the County should not wait to craft the principles under which the freeway will be planned and should instead proactively address land use impacts in the current plan update.

The DMCA outlines a two-fold approach to planning for the HDC. First, the physical design of the project should minimize impacts to biological resources including clear-span bridges and other strategies to maximize the permeability of the corridor to wildlife movement. While project design is outside the scope of the plan update, general design principles are appropriate to include as plan policies.

Mr. Mitch Glaser, Supervising Regional Planner  
Preliminary Draft Antelope Valley Area Plan  
August 29, 2011  
Page 2

Second, improvements to the transportation system should be evaluated in a dynamic planning relationship with land use policy. In much of Los Angeles County, freeways are constructed or widened without consideration of the land use changes that result. Capacity expansions frequently induce changes in housing and employment patterns that negate congestion-reduction benefits in just a few years after project completion. Without travel demand strategies, such as accurate pricing, and strong land use controls, regional transportation improvements fall victim to commute-related congestion.

Therefore, the Conservancy requests the following additional policy:

**Policy M 6.9:** In planning for all regional transportation systems, consider and mitigate potential impacts to wildlife movement and other biological resources in project selection and design, and coordinate transportation improvements with land use strategies to minimize habitat loss and maximize connectivity.

The construction of the HDC must not prompt a departure from the vision of the plan update. The Conservancy is concerned that, without strong land use controls, access to greater remote areas will induce future growth patterns typical of the pre-housing bust Antelope Valley. While the zoning of the preliminary draft plan is appropriate, the plan ominously proposes to reevaluate the land use map in conjunction with the HDC. The Land Use Element states:

A comprehensive study of the Area Plan should be undertaken when a preferred alignment for the HDC is identified and funded for construction. The study should carefully consider potential changes to the Area Plan, including the Land Use Policy Map, *balancing the need for economic development and local employment with environmental priorities*. If the study recommends changes to the Area Plan, a Plan Amendment may be initiated to adopt those changes, pursuant to the County's environmental review and public hearing procedures. (Emphasis added)

While the need for plans to reflect changes on the ground cannot be disputed, the overly broad scope of this proposed revision paves the way for future ill-advised upzoning. The DMCA letter proposes a series of land use and acquisition mitigation measures that support the preliminary draft plan's vision of a mosaic of rural communities amidst an extraordinary environmental setting. The Conservancy requests that the above paragraph be revised to

Mr. Mitch Glaser, Supervising Regional Planner  
Preliminary Draft Antelope Valley Area Plan  
August 29, 2011  
Page 3

restate the plan update's vision and narrow the scope of future expected changes to increasing economic opportunity within existing communities. The Conservancy further requests that the DMCA's vision for a limited-access, freight-priority corridor surrounded by open space be incorporated into the County plan. The HDC should only provide access to existing communities and decidedly avoid growth-inducing access to rural preserve areas.

To ensure compatibility of the HDC with the plan's vision statement, the Conservancy requests the following policy additions and revisions:

**Policy M 5.1:** Support the development of the High Desert Corridor to provide a route for truck traffic between Interstate 5, State Route 14, and Interstate 15. Employ travel demand strategies, such as tolls and congestion pricing, to ensure the priority of freight movement on the High Desert Corridor.

**Policy M 6.10:** Discourage new transportation improvements in rural preserve areas. Prohibit new freeway interchanges in rural preserve areas, except to provide direct access to existing rural town areas.

### **Mobility Element Should Address Biological Impacts of Transportation Infrastructure**

The Conservancy strongly supports several mobility policies in the draft plan. In particular, for both rural highways and local streets, the plan minimizes road pavement widths, which decreases impacts both in terms of physical footprint and wildlife movement. Additionally, the plan discourages street lighting, which will also benefit light-sensitive ecosystems in rural areas. However, vehicle-induced mortality continues to be a leading cause of wildlife mortality in Los Angeles County, affecting common and special status species alike. Without adequate crossing facilities, roads divide habitat blocks and become population sinks. Reducing vehicle-wildlife collisions with road design is both a public safety issue and essential to preserving the Antelope Valley's extraordinary environmental setting.

To address these issues, the Conservancy requests the following additional policy:

**Policy M 3.6:** In rural areas, require wildlife crossing structures to be included in rural highway projects. Encourage the use of clear-span bridges whenever feasible and enlarged culverts elsewhere. Fencing should be designed to funnel wildlife to safe crossing points.

### **Trail Dedications Require Funding for Implementation**

The draft plan includes a series of policies that strongly promote trail development throughout the Antelope Valley Plan Area. The Conservancy strongly supports these policies and looks forward to working with the County and DMCA to implement the Trails Plan. In the Conservancy's experience, required trail dedications from developers are difficult to implement without an attached funding source. Unless dedicated trails are also funded and/or constructed, they often sit idle for years until a receiving entity can open them to the public. This constitutes a temporal loss of recreational resources and should be remedied during the development review process by requiring that trail dedications be fully-funded by the developer. Only provision of a fully-functioning trail system mitigates for impacts to recreational resources.

To address this deficiency, the Conservancy requests the following revision to Policy M 10.2:

**Policy M 10.2:** Connect new developments to existing population centers with trails, requiring trail dedication through the development review and permitting process. Require that trail easements be dedicated to an open space agency or other entity acceptable to the County. Require that, when appropriate, trails be constructed or fully-funded as a development permit condition.

### **Conservation and Open Space Element Will Protect Sensitive Resources**

The Conservation and Open Space Element provides the necessary framework to conserve the Antelope Valley's unique and sensitive natural resources. The Conservancy strongly supports both the general thrust and many specific policies contained within this element. Many of the strategies proposed for the County are exactly those used by the Conservancy and its joint-powers partners in practice. The County would benefit from adoption of these goals and policies County-wide.

The following addition would further strengthen the Conservation and Open Space Element:

**Policy COS 7.6:** Encourage agricultural activity in previously disturbed areas to reduce habitat loss.

The Open Space goals outlined in the draft plan are appropriate and beneficial. The Conservancy looks forward to partnering with the County in their implementation. Minor policy changes would increase specificity and effectiveness under Goal COS 19. First, in the Conservancy's experience, third-party conservation easements are a much more effective mechanism than deed restrictions for protecting open space. The Conservancy's joint-powers partners, including the DMCA and Mountains Recreation and Conservation Authority, are able to successfully enforce open space restrictions through this mechanism. Second, the County identifies multiple potential strategies that provide economic incentive for rural land conservation. The Conservancy is strongly supportive of innovative conservation strategies, such as Transfers of Development Rights (TDR). The plan should include specificity equal to or greater than the County's Draft General Plan regarding these programs, including implementation timelines. Additionally, the Antelope Valley Plan should state the County's intention to partner with the Cities of Palmdale and Lancaster to create an inter-jurisdictional TDR program encompassing the entire Antelope Valley.

The following policy revisions would address these points:

**Policy COS 19.3:** Allow large contiguous open space areas to be distributed across individual lots so that new development preserves open space while maintaining large lot sizes that are consistent with a rural environment, provided that such open space areas are permanently protected through conservation easements in favor of an open space agency or other entity acceptable to the County.

**Policy COS 19.4:** Pursue innovative strategies for open space acquisition and preservation through the land development process, such as Transfers of Development Rights, Land Banking, In-Lieu Fee Acquisition, and Mitigation Banking, provided that such strategies preserve rural character. Pursue partnerships with the Cities of Palmdale and Lancaster to establish inter-jurisdictional land conservation programs.

### **Renewable Energy Map Missing Key Wildlife Corridor**

The draft Renewable Energy Priority Production Map does not include a wildlife corridor in the Vincent Grade vicinity that runs parallel to the Antelope Valley-Santa Clara River watershed boundary. This area is currently proposed to be included in the High Priority Zone, however it forms a critical narrow habitat linkage between development in Acton and the Palmdale urban area. Energy projects in this area must be carefully sited to avoid

Mr. Mitch Glaser, Supervising Regional Planner  
Preliminary Draft Antelope Valley Area Plan  
August 29, 2011  
Page 6

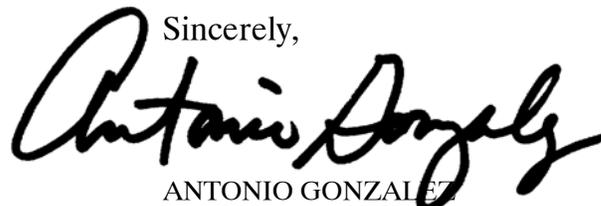
severing this linkage. This area may not be appropriate for a High Priority Zone designation for this reason.

**Conservancy Requests Changes to be Made Prior to DEIR**

The above changes are minor in nature and complementary with plan's vision statement. Therefore, the Conservancy requests that they be made to the plan prior to conducting the draft environmental impact report (DEIR).

The draft Antelope Valley Area Plan is truly a landmark event in the sustainable future of the Antelope Valley. It changes course from decades of poorly managed growth and charts a path forward ameliorating the environmental effects of past decisions. The County deserves credit for advancing a community-based, environmentally sound vision for the Antelope Valley's development.

If you have any questions, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at (310) 589-3200, ext. 128.

Sincerely,  
  
ANTONIO GONZALEZ  
Chairperson

Attachment

**SANTA MONICA MOUNTAINS CONSERVANCY**

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June 27, 2011

Ms. Julie Lowry, Principal Planner  
General Plan Development Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Supplemental Comments on Los Angeles County Draft 2035 General Plan**

Dear Ms. Lowry:

The Santa Monica Mountains Conservancy (Conservancy) appreciates the opportunity to comment on the Draft 2035 General Plan. In addition to our previous comments, dated May 23, 2011, the Conservancy offers the following comments. It is our hope that the proposed changes contained herein can be made to the draft plan prior to the issuance of the Notice of Preparation such that they are included in the environmental review process.

**Requested Revisions to Significant Ecological Area Boundaries**

Since our May 23, 2011 letter, the Conservancy has identified specific requested additions to the County's proposed Significant Ecological Areas (SEAs). The attached additions are refined versions of previous Conservancy requests. All of these requested additions are substantially similar to and contiguous with the habitat contained within the County's proposed SEAs. The Conservancy sees no justification for exclusion of these habitat areas from SEA designation when they are ecologically interrelated and biologically similar to the County's designations. Each requested addition is discussed in detail below.

**Proposed Newhall Wedge Addition to Santa Susana Mountains/Simi Hills SEA**

The Conservancy requests a northerly expansion of the proposed SEA designation north of the I-5 in the "Newhall Wedge". The requested addition would extend northerly along I-5 to Calgrove Boulevard, then easterly along the edge of current development to Pine Street, as depicted in the attachment. An additional portion would extend easterly from Pine Street along the Eternal Valley Fire Road, then southerly along the ridgeline to the County's proposed SEA boundary. The expansion would include the area between I-5 and The Old Road, which contains a rich California Walnut Woodland community and Mountains Recreation and Conservation Authority (MRCA) parkland.

This expanded area includes two blue line streams home to Southern Coast Live Oak Riparian Forest and known occurrences of California orcutt grass (*Orcuttia californica*), a state- and federal-listed species. Additional rare or threatened species occurrences in the expanded area include slender mariposa lily (*Calochortus clavatus var. gracilis*) and Palmer's grapplinghook (*Harpagonella palmeri*). The California Walnut Woodland in the southwestern portion of the expanded area is part of the known range for western mastiff bat (*Eumops perotis californicus*).<sup>1</sup>

Most importantly, the expanded area forms part of the Newhall Wedge habitat block and facilitates critical regional wildlife movement. Due to existing constrained conditions, the Newhall Wedge habitat block must be of sufficient size to support a viable home range for medium-sized mammals in order to continue its present role in regional connectivity. The expanded area would ensure that existing conditions do not deteriorate further.

The County's proposed SEA is deficient for not including approaches to two freeway undercrossings within the designated area. Both The Old Road and Calgrove Boulevard undercrossings are essential for maintaining regional habitat connectivity—the primary purpose of designating this SEA. The Old Road undercrossing is rated the highest quality of all I-5 crossing points in the Newhall Wedge. The crossing is open, with ample tree cover on both east and west approaches. To effectively protect wildlife movement, the SEA must include all approaches to this undercrossing. Topographical constraints require protection of the entire ridge to ensure access from the north. The woodland area on both sides of The Old Road must likewise be included.

The area's known rare resources and critical importance in regional wildlife connectivity warrant its inclusion in the Santa Susana Mountains/Simi Hills SEA.

### **Proposed Mormon Canyon Addition to Santa Susana Mountains/Simi Hills SEA**

The Conservancy also requests an addition to the Santa Susana Mountains/Simi Hills SEA that includes Mormon Canyon on the southern flank of Oat Mountain. The proposed expansion is ecologically unified with the adjacent Browns Canyon, much of which is protected by the MRCA. Like Browns Canyon most of Mormon Canyon consists of Southern Mixed Riparian Forest, providing a critical water source and cover on an

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<sup>1</sup>Department of Fish and Game. *California Natural Diversity Database*.

otherwise arid south-facing slope. As a tributary of Browns Canyon, any disturbance in the upper Mormon Canyon watershed will affect downstream resources within the County's proposed SEA. The Conservancy used watershed boundaries as the basis for the proposed SEA expansion, which is shown in the attachment.

Mormon Canyon is a critical piece of the Oat Mountain habitat block. The woodland habitat in upper Mormon Canyon is actually superior to Browns Canyon and in closer proximity to California Walnut Woodland and Valley Oak Woodland on the other side of the ridge. The lushness of the vegetation in upper Mormon Canyon suggests the presence of a spring and provides ample cover for southwest-northeast wildlife movement. Due to its ecological similarity with Browns Canyon, a biological survey would likely identify occurrences of the same rare or threatened species, including two-striped garter snake (*Thamnophis hammondi*), coast horned lizard (*Phrynosoma blainvillii*), and Plummer's mariposa lily (*Calochortus plummerae*).

#### **Proposed Valley Oaks Savannah-Santa Susana Mountains/Simi Hills SEA Connection**

The current extent of the proposed Valley Oaks Savannah SEA does not follow the County's own imperatives for SEA selection and design. The County's previous experience shows that small, isolated SEAs do not adequately protect significant resources. As explained in the County's Conservation and Open Space Element Resources, the design of the current 1980 SEAs is deficient due to the creation of habitat "islands" surrounded by soon-to-be-urbanized land:

Because some of the "island" habitats were isolated from each other by development within the intervening areas, the opportunity for species movement and genetic dissemination was dramatically reduced. Therefore, the identification of island habitats, independent of the entire ecosystem, was ultimately deemed to be unsustainable.<sup>2</sup>

Despite this previous experience, the County's proposed Valley Oaks Savannah SEA is precisely that: a habitat "island". To address this deficiency, the Conservancy proposes an expansion of the Santa Susana Mountains/Simi Hills SEA that connects directly with the Valley Oaks Savannah SEA. As shown in the attachment, the requested addition would

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<sup>2</sup>Appendix E: Conservation and Open Space Element Resources. *Draft 2035 General Plan 56*

extend from public parkland in Pico and Potrero Canyons around built-out Stevenson Ranch to reach the Valley Oaks. Without this habitat connection, terrestrial mammals would be unable to access the isolated block. As a result, the Valley Oaks would not support a healthy predator population and the ecosystem would be unsustainable in the long term. Furthermore, adaptation to climate change would be precluded by the genetic barrier and physical constraint on species home range evolution.

### **Requested Amendments to County Highway Plan**

During the One Valley One Vision planning effort in the Santa Clarita Valley, the Conservancy requested specific amendments to the highway plan to reduce impacts to biological resources. Should it be impossible to make these changes through that planning vehicle, the Conservancy requests that the following proposed rural widenings or extensions be removed from the General Plan Mobility Element:

- Agua Dulce Canyon Road
- Davenport Road
- Escondido Canyon Road
- Bouquet Canyon Road north of Copper Hill Drive
- The Old Road south of Calgrove Boulevard
- Placerita Canyon Road
- Shadow Pines Boulevard/Tick Canyon Road (proposed extension)
- Sierra Highway north of Vasquez Canyon Road
- Pico Canyon Road

The Conservancy contends that each of the above projects would have a significant avoidable impact on wildlife movement by increasing wildlife mortality, discouraging crossings, and decreasing genetic exchange. In their comments on the One Valley One Vision Plan, the California Department of Fish and Game independently arrived at the same conclusion.

The science is quite clear in this respect: vehicle collisions are the leading direct human-caused sources of bobcat and mountain lion mortality in Southern California. Wider roads increase mortality and decrease the frequency of successful crossings until a threshold width is reached where crossings are no longer attempted (i.e. across freeways). A study in New

Mexico directly documented these effects on mountain lion populations.<sup>3</sup> Widening roads leads to faster vehicle speeds and larger traffic volumes, both of which are factors in vehicle-wildlife collision rates. Even the width of the pavement has a negative effect on mountain lion dispersal. Local research by the National Parks Service and others have observed frustrated dispersals among tracked carnivores and documented the resulting significant genetic differences across movement barriers.

The Conservancy believes that widening these roads is bad policy. The only possible justification for doubling road capacity within these rural areas is to promote further residential development in remote areas—in direct opposition to the stated goals of the current planning effort. The circulation models appear to assume traffic volume increases only possible if housing continues to sprawl into rural-zoned areas, leading to the misguided recommendation to increase capacity. Even worse, the extension of Shadow Pines Boulevard/Tick Canyon Road all the way to Davenport Road would divide a Significant Ecological Area and provide access to otherwise remote parcels, thereby inducing growth. The County and others are actively promoting protection of these resources through the Angeles Linkage Conceptual Area Protection Plan, so it is unclear why the general plan would then propose fragmenting the same habitat area.

Due to the cumulative nature of the impacts, these issues are best addressed at the plan level. While any one widening could feasibly be mitigated, a succession of mitigated road widenings would still decrease overall landscape-level permeability. The Conservancy therefore requests that these impacts be avoided entirely or comprehensively mitigated at the plan level with appropriate policies and programs, including construction of crossing structures and acquisition of adjacent habitat.

### **Requested Inclusion of Transfer of Development Rights Program**

In discussion with County staff, the Conservancy raised the idea of implementing a countywide Transfer of Development Rights (TDR) program. Such a program would relieve development pressure on sensitive rural areas and facilitate smart growth in urban centers, particularly in connection with transit-oriented developments. It is our understanding that such a program has been included in the Draft 2035 General Plan. The Conservancy is in

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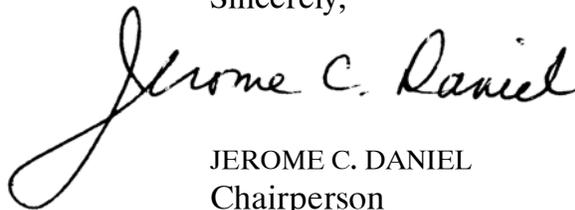
<sup>3</sup>Sweanor, L. L., K. A. Logan, and M. G. Hornocker. 2000. Cougar dispersal patterns, metapopulation dynamics, and conservation. *Conservation Biology* 14:798-808.)

Ms. Julie Lowry, General Plan Development Section  
Supplemental Comments on Los Angeles County Draft 2035 General Plan  
June 27, 2011  
Page 6

full support of the proposed TDR program and looks forward to collaborating with County staff on its design and implementation. For your reference, we have attached the outlines of the proposed program as described by County staff. Specifically, we recommend explicitly including the City of Santa Clarita in the General Plan language to facilitate the program's implementation in the northern portion of the County.

Thank you for your consideration of these comments. The Conservancy appreciates the ongoing collaboration with your staff as this process moves forward. We hope that these requested revisions, additions, and deletions can be accomplished prior to commencement of the Draft Environmental Impact Report such that they can be fully vetted during environmental review. If you have any questions, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128.

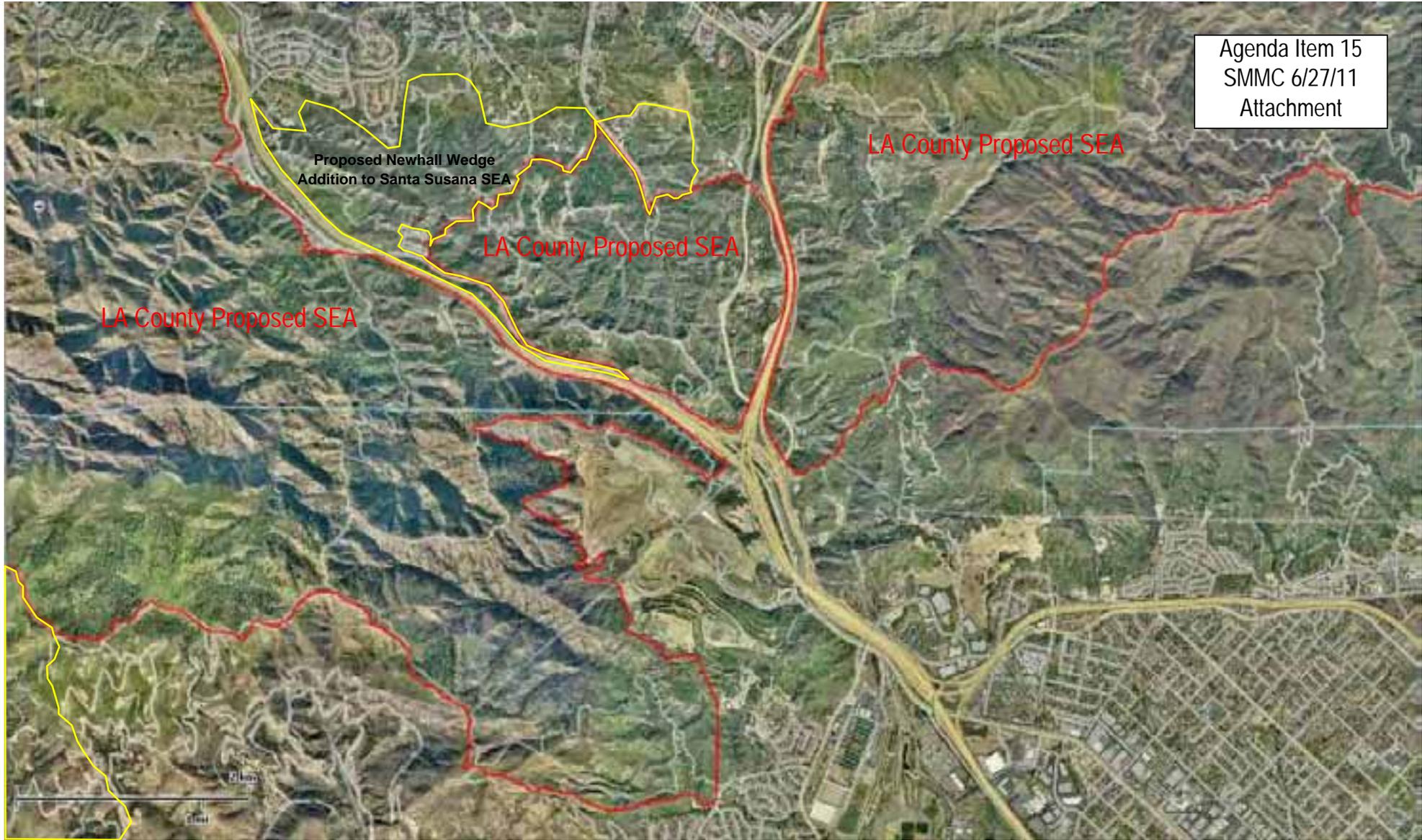
Sincerely,

A handwritten signature in black ink that reads "Jerome C. Daniel". The signature is written in a cursive style with a large, looping initial "J".

JEROME C. DANIEL  
Chairperson

Attachments

Agenda Item 15  
SMMC 6/27/11  
Attachment

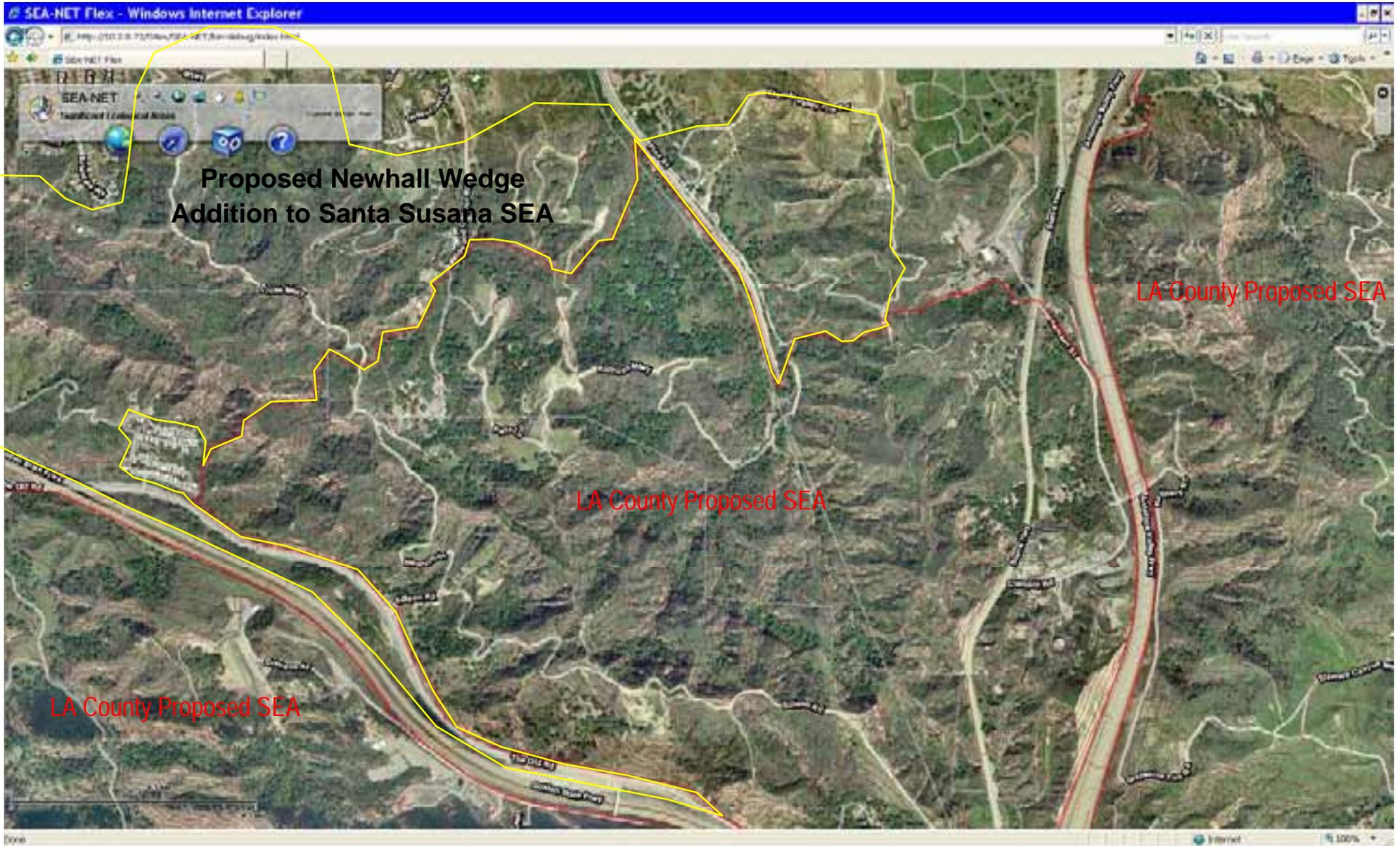


Proposed Newhall Wedge  
Addition to Santa Susana SEA

LA County Proposed SEA

LA County Proposed SEA

LA County Proposed SEA



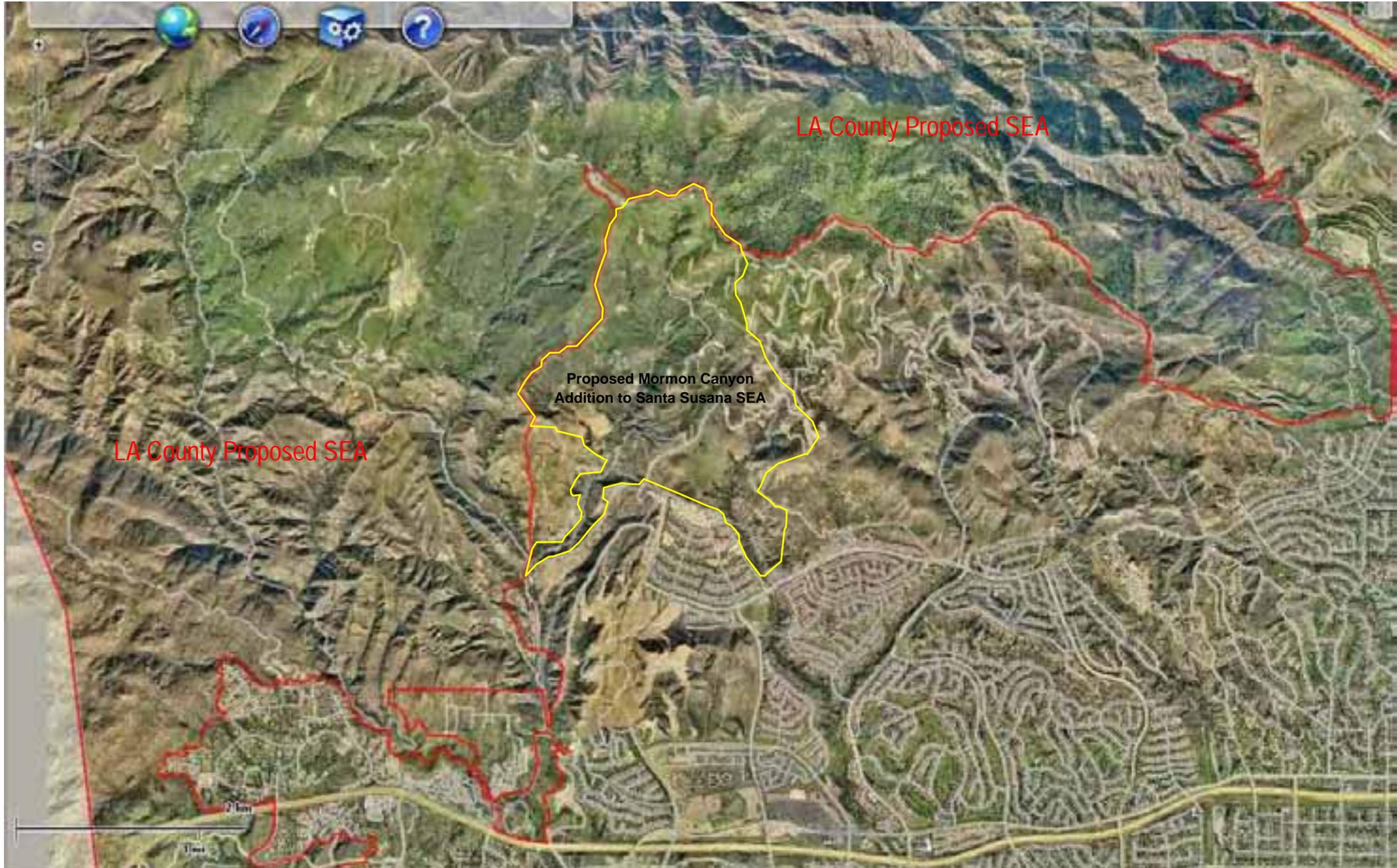
**Proposed Newhall Wedge  
Addition to Santa Susana SEA**

LA County Proposed SEA

LA County Proposed SEA

LA County Proposed SEA

Extend to Calgrove Undercrossing



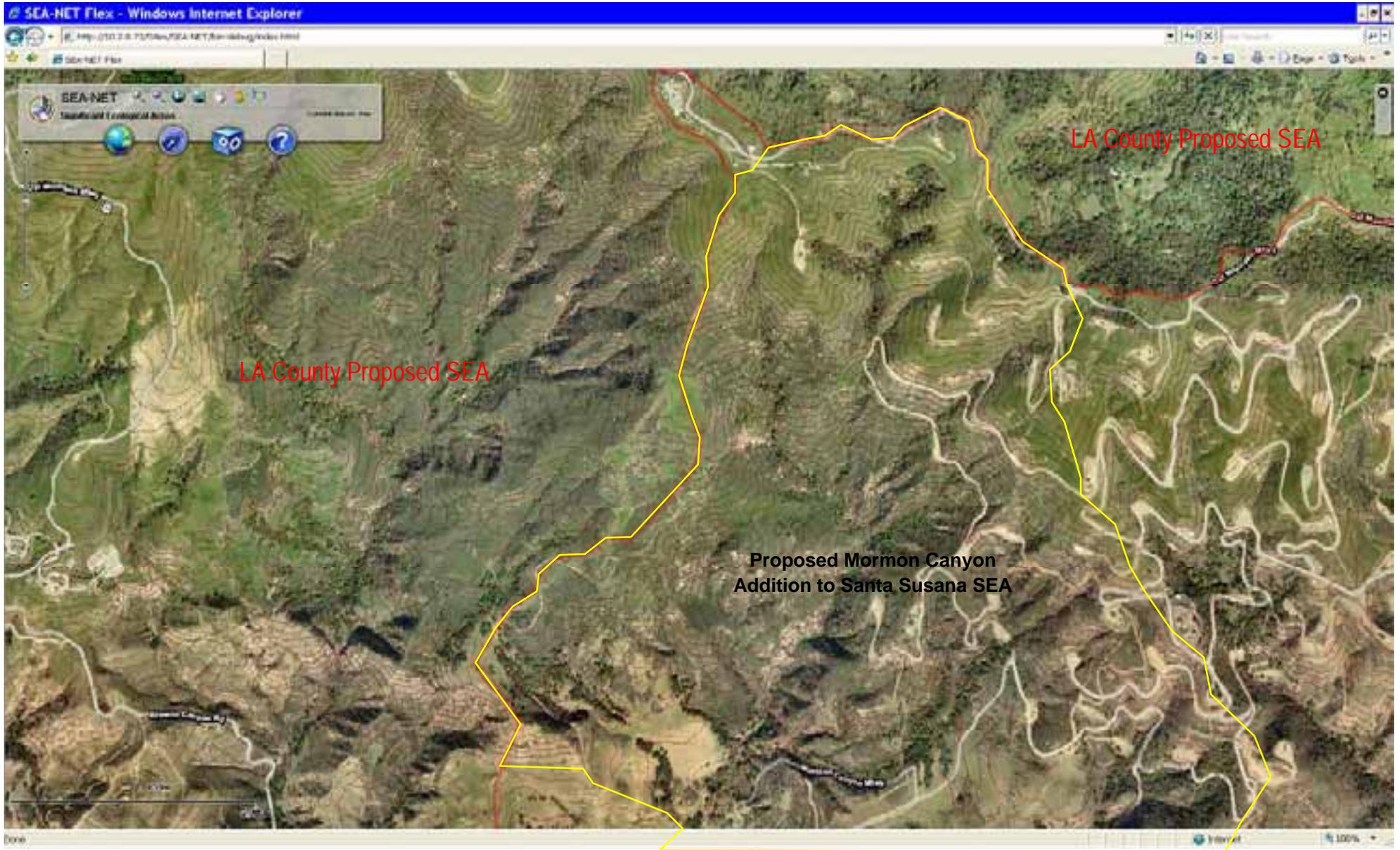
LA County Proposed SEA

Proposed Mormon Canyon  
Addition to Santa Susana SEA

LA County Proposed SEA

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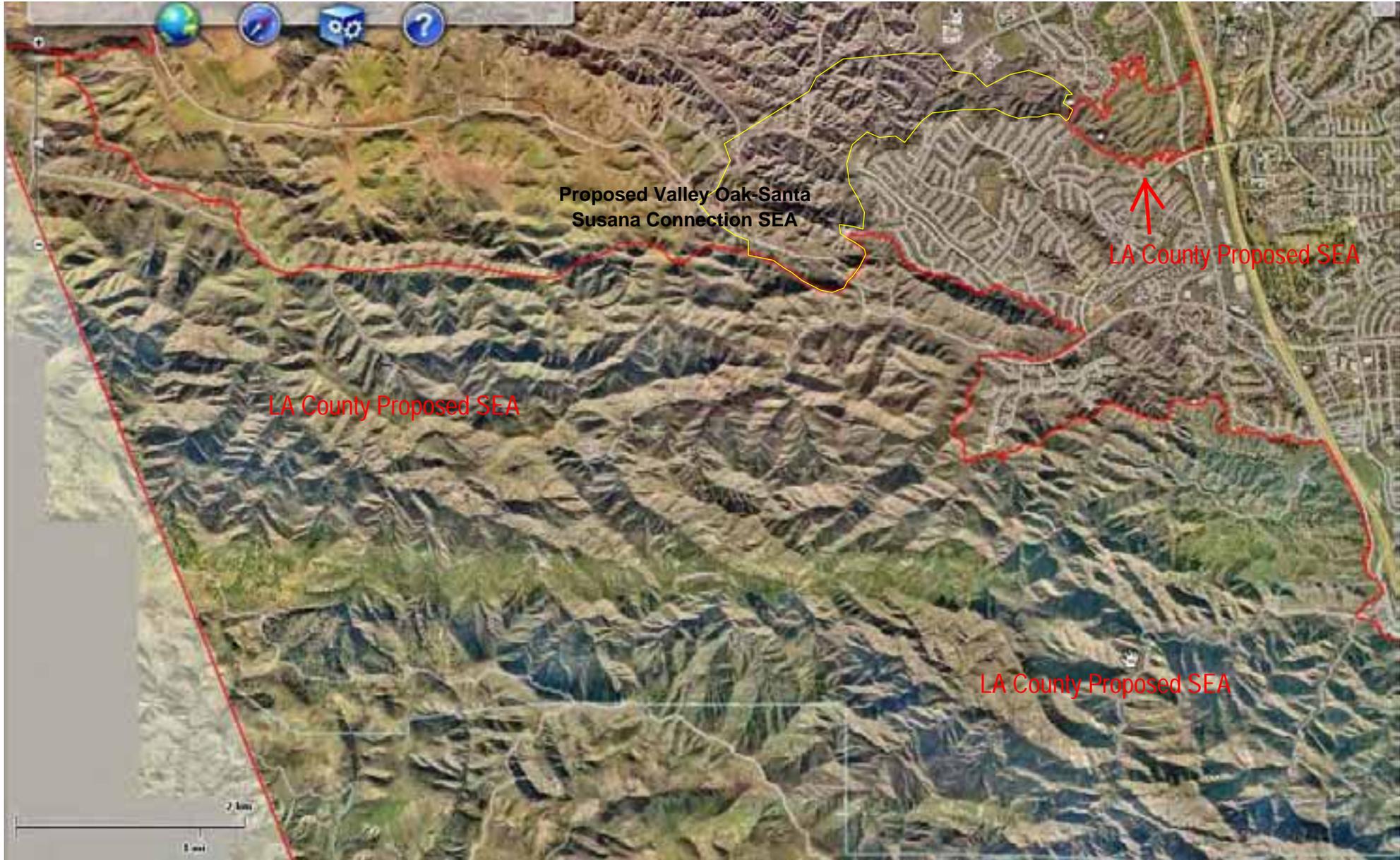




LA County Proposed SEA

Proposed Mormon Canyon  
Addition to Santa Susana SEA

LA County Proposed SEA



Proposed Valley Oak-Santa  
Susana Connection SEA

LA County Proposed SEA

LA County Proposed SEA

LA County Proposed SEA



**Proposed Valley Oak-Santa  
Susana Connection SEA**

LA County Proposed SEA

LA County Proposed SEA

SEA-NET

Map of California

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Map

**From:** [Glaser, Mitch](#)  
**To:** [Eric Bruins](#); [Paul Edelman](#)  
**Cc:** [Jason Smisko](#); [Chung, Connie](#)  
**Subject:** TDR Program  
**Date:** Tuesday, June 14, 2011 9:35:02 AM

Agenda Item 15  
 SMMC 6/27/11  
 Attachment

Good Morning Eric and Paul:

On May 17, the Santa Monica Mountains Conservancy (SMMC) sent a letter to the Santa Clarita City Planning Commission regarding the City's General Plan Update. The City's General Plan Update is a component of "One Valley One Vision" (OVOV), which is a joint effort between the City and Los Angeles County. The other component is the County's Santa Clarita Valley Area Plan Update.

The SMMC letter stated, in part, "The Conservancy therefore recommends that the City include an additional policy that directs staff to work with the County to establish an inter-jurisdictional development rights transfer program wherein development rights from all rural-zoned parcels are eligible for transfer to urban-zoned areas, subject to reasonable conditions. Such a program could even provide a bonus for transferring rights from rural parcels within a SEA to leverage the benefits of such a program."

As you may be aware, the County is also in the process of updating its Countywide General Plan. A draft was released in April and may be found at the following Web Site:  
<http://planning.lacounty.gov/generalplan>

The Draft Countywide General Plan Update must undergo an environmental review (EIR) prior to public hearings. A Notice of Preparation for the EIR will be released shortly and we anticipate that the EIR will be released in early 2012. Public hearings before the County's Regional Planning Commission and Board of Supervisors will occur after the EIR is released and we anticipate that the Countywide General Plan Update will be adopted by the end of 2012.

The Draft Countywide General Plan Update includes a Transfer of Development Rights (TDR) implementation program, which I have copied below. The "Phase 2" timeframe means 3-5 years after adoption:

			Timeframe			
Implementation Program	Actions	General Plan Policies	Phase 1	Phase 2	Phase 3	Ongoing
Transfer of Development Rights Program	<ul style="list-style-type: none"> <li>Explore the feasibility of a Transfer of Development Rights (TDR) Program in order to direct growth and development away from valuable open space areas to identified infill areas.</li> </ul>	Land Use Element: Goals LU 3, LU 4		X		

	<ul style="list-style-type: none"> <li>· Identify open space, rural and agricultural areas, including Agricultural Resource Areas (ARA) and Significant Ecological Areas (SEAs), under development pressure as sending areas. Identify potential receiving areas, such as TODs and vacant and underutilized sites, in urban areas</li> <li>· Prepare an ordinance that outlines applicability and procedures for the TDR Program.</li> <li>· Establish County entity to coordinate the sales and transactions of TDR.</li> </ul>					
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I feel that this TDR implementation program is in line with what the SMMC would like to see in the Santa Clarita Valley.

Given the large number of cities in the County, it would be practically impossible for the County to pursue an inter-jurisdictional TDR program with all of them. However, it is possible for the County to work with the City of Santa Clarita on this program, and it makes sense when you consider that the City is completely surrounded by County territory (unlike any other City in the County) and that the City and County are already committed to joint planning, as evidenced by the OVOV effort.

We could add another bullet point to the description of the program that would indicate that we will work with the City of Santa Clarita. The bullet point would be something to the effect of "Include the City of Santa Clarita in the TDR program in order to continue the joint planning efforts initiated by the One Valley One Vision program." Given the technical and legal challenges, we can't guarantee that we'll ultimately have an inter-jurisdictional program with the City, but this implementation program would commit the City to exploring the feasibility with us and working with us on our ordinance and (potentially) a companion ordinance in the City's Unified Development Code.

I have conferred with Jason Smisko, my counterpart at the City of Santa Clarita, and he indicated that the City is willing to participate in this program. He will acknowledge this during his presentation to the Santa Clarita City Council. I have also conferred with Connie Chung, my colleague who is responsible for the Countywide General Plan Update, and she is also willing to pursue this. I anticipate that the Draft Countywide General Plan Update will be amended accordingly.

I hope that this addition will fulfill SMMC's recommendation. If you have any questions or concerns, please feel free to contact me. As previously discussed, I will set up a meeting with the SMMC in the

near future to discuss the County's Santa Clarita Valley Area Plan Update and SMMC's concerns in that regard. The meeting will also provide an opportunity to discuss the Countywide General Plan Update and the County's Antelope Valley Area Plan Update, which is also in progress and will be adopted concurrently with the Countywide General Plan Update.

Thanks,  
Mitch

Mitch Glaser, AICP  
Supervising Regional Planner  
Community Studies North Section  
Department of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012  
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May 23, 2011

Gretchen Siemers, Planner, AICP  
Housing Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Comments on Los Angeles County Draft 2035 General Plan**

Dear Ms. Siemers:

The Santa Monica Mountains Conservancy (Conservancy) offers the following initial comments on the Draft 2035 General Plan. We anticipate providing additional comments on the Plan later. From 2001 to 2008, the Conservancy has submitted five comment letters on the General Plan, Significant Ecological Areas (SEAs) and SEA Update Study, SEA Proposed Regulatory Changes, and Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Comprehensive Update and Amendment to the Los Angeles County General Plan.

In this current letter, we emphasize several key comments. It is our understanding that an Environmental Impact Report (EIR) will be prepared by the County for the Draft 2035 General Plan. We understand the County will soon release a new NOP for the Draft General Plan. The General Plan and EIR will be deficient if they do not incorporate the following provisions.

**Significant Ecological Area Boundaries**

In previous comment letters, the Conservancy expressed its support for the more inclusive SEA boundaries (compared with current SEA boundaries) and the Conservancy commended the County on applying this approach. We compliment the County's efforts to propose more inclusive and biologically sound boundaries to ensure the long term ecological sustainability of the SEAs.

The Conservancy's letters, as well those of local agencies, have explicitly defined ecologically justified SEA boundary expansions. Those boundary expansion requests are

each accompanied by a rationale supported by at least one basic principle of conservation biology related to SEA ecological sustainability.

To our knowledge the County has not gone on record with opposing arguments rooted in the principles of conservation biology that justify the exclusion of areas recommend for SEA inclusion by the both the Conservancy and other government entities. The onus is at least equally upon the lead agency to justify the exclusion of such recommended inclusion areas as it is for the recommending agencies to provide detailed studies to justify what are plainly visible macro-landscape level spatial relationships shown on Google Earth aerial photographs. Both the General Plan and its EIR will be more evolved and defensible documents if they include rationale for the exclusion of those SEA expansion areas recommended by government agencies with conservation biology staffs. Likewise such rationale is equally applicable to supporting the inclusion of areas within the County staff's proposed SEA boundary expansion areas.

The EIR must include a feasible alternative with larger SEA boundaries for the SEAs identified in the Conservancy's and other government agencies' previous comment letters (for example, see December 23, 2002 Conservancy letter, enclosed).

### **Dedications of Land and Conservation Easements**

The Conservancy concurs with many policies and implementation actions in the General Plan including Policy C/OS 1.3, which states:

Create an established network of open space areas that provide regional connectivity, between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to the Puente Chino Hills.

However, the Draft General Plan is lacking in addressing key issues with respect to open space dedications. As indicated in our December 23, 2008 letter (enclosed), an implementation action should be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require permanent open space dedications and protection as part of the development process to mitigate adverse environmental impacts. Open space dedications must be offered to open space park agencies or another entity acceptable to

the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

Furthermore, the General Plan should include a policy or implementation action specifying the timing of any open space dedications. The General Plan should specify that if a conservation easement, conservation easement offer to dedicate (OTD), or fee title dedication is offered in conjunction with County-issued permit or approval, then that conservation easement, OTD, or transfer of deed is required to be recorded prior to the issuance of any permits or recordation of parcel or tract maps. The General Plan should also specify that appropriate entities to accept land transfers or conservation easements include open space park agencies, conservation agencies, or another entity acceptable to the County. Homeowners associations (HOAs) are not appropriate entities to accept such offers, as HOAs sometimes have missions and goals that conflict with the primary purpose of protecting natural land. (Ownership and/or management by HOAs of landscaped or modified areas is appropriate.) The General Plan should also emphasize fee simple dedications and conservation easements over deed restrictions, as they provide the only permanent vehicles for long-term protection of land.

In addition, the General Plan should specify that long-term maintenance funding must accompany any land transfer for the mitigation measure to be complete and sustainable. Open space protection and management requires a permanent funding source that can only be provided by development applicants or the occupiers of their developments. Under all other scenarios the public is shouldered with permanent funding liability. This funding can consist of one of the following options: (1) Community Facilities (Mello-Roos) District, (2) Landscape Maintenance District, or (3) an up front endowment obligation.

### **Trail Dedications**

The General Plan should include a policy or implementation action outlining the conditions under which a trail dedication could be required as part of the development approval process. As we indicated in a previous letter (December 23, 2008, enclosed), an implementation action should be added, which states:

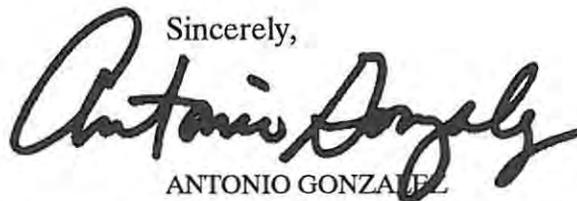
Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require trail easement dedications as part of the development process to mitigate adverse recreational impacts. Trail easement dedications must be offered to open

space park agencies or another entity acceptable to the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

The General Plan should also specify that if a trail easement or trail easement OTD is offered in conjunction with County-issued permit or approval, then that trail easement or OTD must be required to be recorded prior to the issuance of any permits or recordation of the tract map.

Thank you for your consideration of these initial comments. We anticipate submitting additional comments on the Draft 2035 General Plan later. Should you have any questions, please contact Paul Edelman, Deputy Director for Natural Resources and Planning, by phone at (310) 589-3200 ext. 128.

Sincerely,

A handwritten signature in black ink that reads "Antonio Gonzalez". The signature is written in a cursive, flowing style.

ANTONIO GONZALEZ  
Chairperson

Encs. December 23, 2002 letter from Santa Monica Mountains Conservancy to County of Los Angeles, Department of Regional Planning, re: Comments on Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan

December 23, 2008 letter from Santa Monica Mountains Conservancy to County of Los Angeles, Department of Regional Planning, re: Comments on Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008

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December 23, 2008

Mr. Mark Herwick  
County of Los Angeles  
Department of Regional Planning  
General Plan Development Section  
320 West Temple Street  
Los Angeles, California 90012

**Comments on Los Angeles County Draft General Plan:  
Planning Tomorrow's Great Places 2008**

Dear Mr. Herwick:

Santa Monica Mountains Conservancy (Conservancy) staff offers the following comments on Los Angeles County Draft General Plan: Planning Tomorrow's Great Places 2008. We understand that the County is currently preparing the Draft Environmental Impact Report for the Plan. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

### **Open Space Dedications**

Conservancy staff concurs with many of the goals, policies, and implementation actions in the Conservation and Open Space element such as Policy C/OS 2.1, "Develop and expand regional and local parkland in the County," and Implementation Action C/OS 1.1, "Coordinate with Local, State, and Federal park agencies and conservancies to acquire open space for recreation and biotic preservation throughout the County." However, implementation actions should be added at the beginning of the plan's life to encourage or require open space dedications as part of the development process. For example, Implementation Action C/OS 2.2 could be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require permanent open space dedications and protection as part of the development process to mitigate adverse environmental impacts. Open space dedications must be offered to open space park agencies or another entity acceptable to the County. Guidelines must clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

In addition, under the Design Guidelines for Significant Ecological Areas (SEAs; p. 135), we recommend adding the following underlined language:

2. At a minimum, Retain a contiguous area of undisturbed open space over the most sensitive natural resources to maintain regional connectivity within the undeveloped area, and preserve this area in perpetuity through a recorded fee simple dedication to an open space park agency prior to the issuance of any permits.

We strongly support Policy C/OS 5.7, and we recommend the following underlined language be added:

Require that development mitigate “in-kind” for unavoidable impacts to biologically sensitive areas and permanently preserve mitigation sites, via recorded fee simple dedications or permanent deed restrictions prior to the issuance of any permits.

To acknowledge the role that public conservation agencies have in the acceptance of open space dedications, the following underlined text should be added (p. 124, Section II. Open Space, Parks, and Recreation):

For the purposes of the General Plan, open space dedications are defined as privately owned lands that have been set aside for permanent open space space, or dedicated in fee simple or protected in some other manner by a conservation agency, as part of a larger land development proposal. Commitment of such lands to open space use in perpetuity is typically assured through deed restrictions or dedication of construction rights secured ~~at the time of~~ concurrent with, but not later than, development permit approval, or by protection by a conservation agency.

It is critical when County planners are reviewing development proposals, that they are aware of the locations of not only publicly-owned parks and open space, but also privately-owned land protected by conservation easements or deed restrictions. This is an important tool when planning the locations of developments and where future open space should be set aside. It is preferable that contiguous blocks of open space be protected, rather than ending up with disjointed patches. The following implementation action should be added:

Implementation Action C/OS 2.3. Within six months of approval of the General Plan by the County, create, and update periodically, a GIS layer of protected open space owned by Federal, State, County, or other local agencies or non-profits to assist staff in the project review process and aid applicants in their project design. As the following information becomes available, the layer must include other protected lands, such as conservation easements and permanent open space deed restrictions

### Trail Dedications

Conservancy staff supports many of the trail measures in the General Plan, including Policy C/OS 4.1, "Expand multi-purpose trail networks for all users." As with open space dedications, we suggest that implementation actions be added to encourage or require trail dedications as part of the development process. Implementation Action C/OS 4.2 could be added, which states:

Within six months of approval of the General Plan by the County, finalize guidelines with a fully operable framework to encourage or require trail easement dedications as part of the development process to mitigate adverse recreational impacts. Trail easement dedications must be offered to open space park agencies or another entity acceptable to the County. Guidelines should clearly and precisely outline a clear pathway of how and when dedications are accomplished and recorded in the development process.

We support Implementation Action C/OS 4.1, as a GIS layer of proposed trails is a valuable tool for County planners to have when reviewing development applications. Knowing the locations of nearby existing trail easements is also highly valuable in order to successfully site a trail easement on a particular property so that it connects to any trail easements on adjacent properties, or so that it will eventually connect to easements on nearby properties. We recommend that the following underlined language be added:

Within six months of approval of the General Plan by the County, create, and update periodically, a GIS layer of proposed federal, state, county and adjacent city trailways and trailway segments, and existing and proposed trail easements and offers to dedicate trail easements, to assist staff in the project review process and aid applicants in their project design. Field verification should be conducted to determine the legitimacy of trail locations.

### SEAs and Biological Protections

We support the County's identification of the linkages, from the South Coast Wildlands Missing Linkages project, on Figure 6.3, Proposed SEAs map. However, depicting the linkages as simple lines is misleading and grossly inadequate. The General Plan must include a figure replicating the precise boundaries of the least cost unions, and potential crossing structures, for the linkages. There is no better science than this study to define the linkages. This work was done at the parcel level (although that parcel data was not publicly released) and the County may wish to obtain the parcel level data from South Coast Wildlands.

We also compliment the County on the inclusion of several important policies to protect SEAs. However, we do recommend some modifications such as adding the following underlined text to Policy C/OS 5.6:

Require that developments within an SEA be designed to meet the Significant Ecological Area Technical Advisory Committee recommendations, to the greatest extent possible, even it that means some substantive diminution of the property's economic value, and to...Preserve wildlife movement corridors; Site roads to avoid sensitive habitat areas or migratory paths;...Provide open or permeable fencing.

Conservancy staff supports the Design Guidelines for a Model Subdivision Project in an SEA (p. 135) to locate development away from wildlife corridors... (5), avoid impermeable fencing outside the development... (6), and direct outdoor lighting downward, away from adjacent open space areas (7). We recommend adding the following design guideline: "Site and design roads to avoid significant adverse impacts to wildlife movement." We recommend that all of these design guidelines apply to any development, not just subdivisions within an SEA.

In general, we strongly support the more inclusive SEA boundaries as proposed in the Draft General Plan and we commend the County on applying this approach. At the scale of the SEA map online, we are unable to definitively provide more specific comments. According to County staff, maps at a better scale, that can be overlain on other layers such as aeriels, will be provided online by the County in December. We look forward to reviewing those maps online, or other maps with staff, and providing more specific comments on the SEA boundaries at that time.

We continue to strongly recommend against making all single-family homes in SEAs exempt from Significant Ecological Area Technical Advisory Committee review (see the Conservancy's June 14, 2004 letter). Single family estates with vineyards, accessory structures, and other uses can often be much more damaging than a cluster of three moderate-sized homes. The exemption should be amended to state:

Individual single-family residences that will result in less than 5,000 square feet of surface area grading, where only one residence is proposed to be built on a legal lot or parcel of land, including project-related grading impacts.

Per the General Plan, additional information on the regulatory provisions of SEAs is included in the Technical Appendix; per the website the technical appendices will come later. We would appreciate the opportunity to comment on that technical appendix when it becomes available.

We strongly support the Implementation Action C/OS 5.3 (p. 139), although we recommend modifying the text (see also Schlotterbeck 2003<sup>1</sup>):

~~Consider adding~~ Add a new section to the Initial Study Checklist to create a review procedure for open space connectivity. ~~Habitat~~ Habitat connectivity reviews shall consider the physical linkages on the project site and how it will maintain both local and regional habitat connectivity, ~~particularly with regard to wildlife corridors.~~

We also support Implementation Action C/OS 5.2 (p. 139) to create a formal Mitigation Land Banking Program. However, it is not clear why this would only be mitigation for development in areas outside of SEAs, and why it could not include mitigation for development inside SEAs.

The County's Draft General Plan recognizes the challenges at the urban-wildland interface (p. 138). We recommend that another implementation action be added:

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<sup>1</sup>Schlotterbeck, J. 2003. Preserving Biological Diversity with Wildlife Corridors: Amending the Guidelines to the California Environmental Quality Act. *Ecology Law Quarterly* 30(4).

Implementation Action C/OS 4.6. Create guidelines for developments to minimize edge effects at the urban-wildland interface, which may include options for specific actions to manage pets, restrict lighting in open space, create compatible landscaping, etc.

Because of the cumulative impacts to native habitat from the conversion to vineyards, we recommend that the General Plan include the following policy (in Section IV. Agricultural Resources): “Policy C/OS 6.9. In remaining native habitat open space areas, discourage the extensive conversion of sensitive native habitat to agricultural land.”

### **Scenic Resources**

We support the Scenic Resources measures including Policy C/OS 11.1, to “Identify and protect scenic resources,” and Implementation Action C/OS 11.1, “Create a scenic corridor and scenic viewshed program and/or ordinance to protect the County’s remaining scenic resources.”

We recommend that a portion of State Route 14 be given a scenic designation, from its intersection with Escondido Canyon Road, west to the edge of the unincorporated Los Angeles County boundary. This area is included in the Soledad Canyon-Angeles Linkage Conceptual Area Protection Plan (CAPP). Some properties in the CAPP are actively being acquired for permanent protection, involving multiple partners and using several funding sources, including County funds. This area contains an absolutely unique viewshed and it includes the Pacific Crest Trail.

We look forward to reviewing the Technical Appendix (once it becomes available), which pertains to the selection of scenic resources, scenic corridors, and provides practices for their continued protection and preservation (p. 149).

### **Park Uses**

While the Conservancy, a State agency, is sovereign and not subject to local land use regulation, we have many partner agencies which may be affected by the General Plan. As many parks are located in the Open Space land use designation, it is important that necessary park facilities and operations are allowed in the Open Space land use designation. For example, in many cases, park agencies have acquired open space land and used existing buildings for staff residences or offices. We recommend that the following language be added to the open space land use designation (p. 39), under Open Space Conservation (OS-C), Open Space Parks and Recreation (OS-PR), and Water (OS-W):

“Includes passive recreation (e.g., trails) and open space parks and all associated support facilities/uses customarily found in conjunction therewith.”

If possible, we also recommend that the following specific language be included under these categories:

This includes, but is not limited to: park offices and staff residences, camp stores, parking, restrooms, camping, trails, habitat restoration, signage, park fencing/gates, and temporary uses typically allowed in the State Park system.

Also, park agencies will acquire land in the County in non-Open Space land use designations, such as Rural land use designations. It is important that park agencies can open and operate these parks right away for public use, for example, as required by some funding sources. It would be cumbersome to complete a General Plan amendment immediately to change the land use for every property that is acquired by a park agency in order to open and operate the park. We recommend that the following underlined language be added:

Purpose:...[T]he Rural designations:...Preserve areas of significant natural and scenic resources and allow for passive recreation and open space parks and all the associated support facilities/uses customarily found in conjunction therewith. (p. 27).

Under Intensity of Use (pp. 27-28), the underlined language should be added (and should be added to all Rural Land designations):

Rural Land 1. Rural land uses include single family homes, equestrian uses, agricultural and related activities, ~~and~~ other rural activities at one (1) dwelling unit per acre (1 du/ac) density, and passive recreation and open space parks and all associated support facilities/uses found in conjunction therewith.

Because park agencies may acquire land in other land use designations (other than Open Space or Rural), we recommend a blanket statement in the General Plan in the Conservation and Open Space Element (for example, under Goal C/OS-2, p. 132), such as the following:

Allow property in any land use designation to be used for passive recreation (e.g., trails) or open space parks and all associated support facilities/uses customarily found in conjunction therewith.

We recommend that Policy C/OS 4.2 be expanded to address other important park facilities to accommodate multiuse trail users (e.g., differently-abled individuals):

Promote strategically located staging areas, and trail heads, and other support facilities (e.g., parking, campsites, restrooms) to accommodate multiuse trail users.

Also, because many open space parks are established based on the presence of valuable biological resources, they are by definition likely to be included in the County's proposed SEAs. It is important that the SEA regulations proposed in the General Plan do not impede park uses and facilities. We recommend that language be added to the SEA regulations such as:

Passive recreation and open space park and associated support facilities and uses shall be allowed in SEAs. This includes, but is not limited to camping, parking, restrooms, signage, habitat restoration, park fencing/gates, and other uses typical of the State Parks system.

### Open Space Maps and Categories

It appears that some parks are not included as open space on the Open Space figure (identified as Figure 5.1 and 6.1), or Figure 3.2, Distributions of Land Use for Unincorporated Areas. Some of these parks that were excluded are in the Santa Monica Mountains Coastal Zone. You may contact our GIS Project Manager Marc Shores ([marc.shores@mrca.ca.gov](mailto:marc.shores@mrca.ca.gov)) to obtain the latest GIS layer of the Conservancy's and Mountains Recreation and Conservation Authority's (MRCA's) ownerships.

For the open space designations, a category should include parkland owned by MRCA, a local agency. This might fit under the category: "Other Park and Conservancy Land," (p. 124, and on the Open Space figure) with the following underlined text added: "Private recreation areas, private deed restricted open space, ownership by cities, other local agencies, joint powers authorities, and non-profits, and beaches..." We also recommend adding the Conservancy and MRCA to other park agencies that share the goal of managing open space and natural areas in the County (p. 123). The following underlined text should

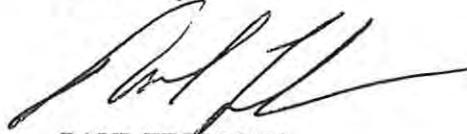
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also be added (p. 123): "Existing open spaces in the County include national forests, state, county, city, and other local parks, and nature preserves." The following underlined text should also be added (p. 130):

Many agencies and individuals own parcels within the 150,000-acre [Santa Monica Mountains National] Recreation Area. There are state, and federally, and locally owned parks, residential neighborhoods, and commercial developments.

Conservancy staff appreciates the opportunity to comment. Please direct any questions or future documents to Judi Tamasi of our staff by phone at (310) 589-3200 ext. 121, by email at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov) and at the above Ramirez Canyon Park address.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Edelman", with a long horizontal flourish extending to the right.

PAUL EDELMAN  
Deputy Director for  
Natural Resources and Planning

**SANTA MONICA MOUNTAINS CONSERVANCY**

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SMMC  
ATTACHMENT 2  
12/02/08  
ITEM 17



August 27, 2007

Bruce W. McClendon  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1309  
Los Angeles, California 90012

## OLD SMMC LETTER

### **Comments on County of Los Angeles Draft Preliminary General Plan Update and Significant Ecological Areas**

Dear Mr. McClendon:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on Los Angeles County's proposed General Plan Update and related documents. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

#### **Conservation/Open Space, Parks and Recreation Resources**

The Conservancy agrees with the proposed County Policy C/OS 1.2:

Create an established network of open space areas that provide regional connectivity, such as areas between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to the Puente-Chino Hills..

#### **Biological Resources**

It is critical to amend the following policy to the Conservation/Open Space Element Policy C/OS 5.1 in order to secure adequate protection of Significant Ecological areas (SEAs), given the potential for significant adverse environmental impacts from development in SEAs.

Maintain and monitor the program and network of Significant Ecological Areas (SEAs). Proposed developments in SEAs shall include mitigation for unavoidable impacts to SEAs from the removal, conversion, or modification

of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

The following policy should be added after Policy C/OS 5.1 to promote, monitor and ensure efforts to protect wildlife corridors.

Site roads to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as road kill) during continued operation of existing roadways and construction of new and expanded roadways.

The General Plan should show where potential habitat linkages remain to connect large regional open space areas, for example, specifically (a) across State Route-14 between Santa Clarita and Palmdale, and (b) across Interstate-5, north of Castaic to the Los Angeles County/Kern County line. The Missing Linkages study (SCWP 2000) addressed numerous habitat linkages, including the two aforementioned. These areas must receive special wildlife corridor designation in the County General Plan Update.

Policy C/OS 5.3 addresses maintaining the integrity of the County's diverse plant communities. Other sensitive and declining plant communities, including coastal sage and native grasslands, should be considered in this policy, in addition of those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game (CDFG).<sup>1</sup> It has been estimated that about 70-90 percent of the pre-settlement coastal sage scrub in Southern California has been destroyed primarily by residential development.<sup>2</sup> Coastal sage scrub also supports a suite of sensitive wildlife and plant species. With respect to native grasslands, it has been estimated that there has been about 99 percent loss of native grassland in California.<sup>3</sup> Valley needlegrass grassland is recognized as very threatened by CDFG. The County should revise the statement C/OS 5.3

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<sup>1</sup> See sensitivity rankings "Sensitivity of Top Priority Rare Natural Communities in Southern California," determined by the California Department of Fish and Game.

<sup>2</sup>As cited in Noss et al.

<sup>3</sup>Kreissman 1991, as cited Noss et al.

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as follows :

“Maximize the ecological function of the County’s diverse natural habitats, such as Joshua Trees, native Oak woodlands, Coastal sage scrub, Valley and needlegrass grasslands, and other perennial grasslands.”

#### **SEA Project Review – Minor Conditional Use Permit for SEA (Minor SEA-CUP)**

Under Biological Resources in Chapter 3 of the Open Space/Conservation Chapter in the General Plan, some exemptions would include new individual homes or desires an accessory to their single-family home within an SEA, a simple site plan review is only needed to verify that zoning standards are observed. This is an administrative procedure that the County deems unnecessary for the Minor SEA-CUP review.

There are numerous scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts, either individually or cumulatively, without adequate avoidance, mitigation, or public review. These procedures also state that if the project(s) on parcels located partially within an SEA, (provided the development area is outside of the SEA), the activity is exempt. Such a sweeping provision would not work with lots 2-acres or larger because both non-structural and future development can result in significant, ecological adverse impacts. For this reason, the proposed single family exemption from a CUP leaves a significant gap in protection. Any acreage above and beyond 2-acres should either be permanently protected with an irrevocable deed restriction or a conservation easement to a public park agency. Such deed restriction or conservation easement must prohibit all future development, including agriculture, non-native plants, equestrian facilities and non-fire department required brush clearance.

#### **SEA-CUP with Significant Ecological Area Technical Advisory Committee (SEATAC) Review**

The SEA Regulatory Review Procedures for CUPS (including SEATAC review) should provide the highest level of protection because realistically, large scale subdivision projects could potentially result in the greatest impacts to the SEAs. The following statement should be amended to:

“Recommendations ~~may~~ will include the clustering of structures away from sensitive areas, and then dedicating the area as natural open space to a public park agency. Other recommendations may include limiting lighting, protection of habitat linkages and movement corridors, providing wildlife-

permeable fencing, and maintaining a short distance between existing infrastructure regulating new development to limit grading of natural vegetation.”

### **Scenic Resources**

Upon review, the Conservancy recommends that the following statement to be amended as follows in Figure 5.6:

Preserve ~~significant~~ sensitive trees and habitats, natural watercourses, wildlife corridors and distinctive natural features.

Los Angeles' landscape is filled with hillside, scenic resources. It is essential to recognize the need to preserve important significant viewsheds found within the County. The Conservancy strongly recommends that the grading percentage qualification should be reduced from 25% to 15% under the Hillside Management Ordinance and the Hillside Management CUP. Topography and natural biological resources enable the residents of Los Angeles County to enjoy all the scenic resources, including the hillsides.

### **Soledad Canyon, Angeles Connector**

The Angeles Connector, also known as the Soledad Canyon Conceptual Area Protection Plan (CAPP), is a critical wildlife movement zone. The Connector is a critical biological pathway linking the two portions of the Angeles National Forest. Though it may not qualify as a SEA, the Conservancy strongly recommends that the CAPP area be included as a wildlife movement area in the County General Plan and all open space and SEA maps. Portions of the CAPP have been included alongside the Santa Clara River SEA (SEA 25), and a copy of the CAPP boundaries is attached.

### **Significant Ecological Areas**

The comments in this section refer to the draft documents and maps from the Los Angeles County Department of Regional Planning Website entitled “Significant Ecological Areas”, proposed as part of the General Plan Update. The Conservancy notes that the proposed SEAs are noticeably larger than those that are currently adopted within the County. The Conservancy continues to commend the County and the consultant team on the excellent work done for designating the boundaries of the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The Conservancy appreciates the

County of Los Angeles  
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August 27, 2007  
Page 5

County's efforts on incorporating some of the Conservancy's prior recommendations regarding SEA boundaries.

**SEA 27, Santa Susana Mountains and Simi Hills**

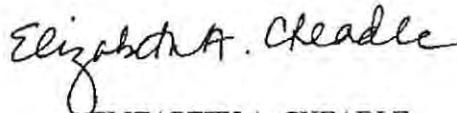
The Significant Ecological Area of the Santa Susana Mountains and Simi Hills should be expanded to include the following vital biological resources. A key part of supporting the SEA are the Big Cone Fir trees between Interstate-5 (I-5) and California State Route-14 (SR-14) in the southern boundary of the City of Santa Clarita and unincorporated Los Angeles County. The proposed boundary of SEA 27 at the junction I-5 and SR-14 lies just south of protecting a critical wildlife movement corridor that connects the Santa Susana Mountains from the west to the San Gabriel Mountains to the east. The wildlife corridor pathway is wedged between the two highways and crosses through the unique Big Cone Fir trees. The Conservancy strongly recommends that SEA 27 boundary be extended northward to encompass much more of the Big Cone Fir trees.

**SEA 25, Santa Clara River**

The Santa Clara River is a long, delicate Significant Ecological Area. The SEA boundaries near Agua Dulce Canyon and south of SR-14, should be extended east towards Escondido Canyon where there is an existing wildlife corridor leading to SR-14 lies just east of the Agua Dulce Canyon boundary found in SEA 25.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at the above Ramirez Canyon Park address provided above.

Sincerely,



ELIZABETH A. CHEADLE  
Chairperson

**SANTA MONICA MOUNTAINS CONSERVANCY**

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SMMC  
ATTACHMENT 3  
12/02/08  
ITEM 17



June 14, 2004

Mr. James Hartl  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

## OLD SMMC LETTER

### County of Los Angeles General Plan Update

Dear Mr. Hartl:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on Los Angeles County's proposed General Plan Update and related documents, including the Draft Significant Ecological Areas Proposed Regulatory Changes (from the County Department of Regional Planning website). The Conservancy provided related comments in an April 30, 2001 letter to the County on the Significant Ecological Areas Update Study, and in a December 23, 2002 letter to the County on the Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan (enclosed). (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

#### Conservation/Open Space Element

It is critical to add the following policy to the Conservation/Open Space Element (e.g., after Policy O-6.3) to ensure adequate protection of Significant Ecological Areas (SEAs), given the potential for significant adverse environmental impacts from developments in SEAs.

Proposed developments in SEAs shall include mitigation for unavoidable impacts to SEAs from the removal, conversion, or modification of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

Similar to proposed policies O-10.8 and O-12.1, which address recreational opportunities and watershed protection, the following policy should be added after Policy O-5.4 to promote proactive conservation efforts to protect sensitive biological resources:

Pursue and encourage public and/or private funding for the purchase of parcels and/or conservation easements within SEAs to preserve significant ecological resources.

The County is not in the position of advocating development; rather the County responds to and regulates development proposals. Policy O-5.1 should be amended to read: “~~Advocate~~ Restrict development that is ~~highly compatible with~~ compromises biotic resources.”

Policy O-5.3 addresses maintaining the integrity of the County’s diverse plant communities. Other sensitive and declining plant communities, including coastal sage scrub and native grasslands, should be considered in this policy, in addition to those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game (CDFG).<sup>1</sup> It has been estimated that about 70-90 percent of the presettlement coastal sage scrub in southern California has been destroyed mostly by residential development.<sup>2</sup> Coastal sage scrub also supports a suite of sensitive wildlife and plant species. With respect to native grassland, it has been estimated that there has been about 99 percent loss of native grassland in California.<sup>3</sup>

Policy O-6.3 for SEAs should be amended as follows: “Site roads and utilities to avoid sensitive ~~critical~~ habitat areas or migratory paths.” If “critical” habitat is retained, this may appear to limit the analysis to only habitat designated by the United States Fish and Wildlife Service as “critical habitat,” when other areas also provide significant habitat values.

The following language should be added to Policy O-6.3 for SEAs, and this policy should also be added to the Circulation Element:

Site roads to avoid significant adverse impacts to wildlife movement.  
Mitigate adverse impacts to wildlife (such as roadkill) during continued

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<sup>1</sup> See sensitivity rankings, “Sensitivity of Top Priority Rare Natural Communities in Southern California,” determined by the California Department of Fish and Game.

<sup>2</sup> As cited in Noss et al. 1995

<sup>3</sup> Kreissman 1991, as cited in Noss et al. 1995

operation of existing roadways and construction of new and expanded roadways.

As stated in the Conservancy's December 23, 2002 letter, the General Plan should show where potential habitat linkages remain to connect large regional open space areas, for example, specifically (a) across State Route-14 between Santa Clarita and Palmdale, and (b) across Interstate 5, north of Castaic to the Los Angeles County/Kern County line. The Missing Linkages study (SCWP 2000) addressed numerous habitat linkages, including these two. These areas must receive special wildlife corridor designation in the General Plan.

The Conservancy supports Policy O-10.9 which states in part "[a]dvocate development of... equestrian, biking and hiking trails..." The following policy should be added after Policy O-10.9: "Where feasible and consistent with public safety and operational uses, encourage joint use for public access on infrastructure access roads, and under utility lines."

The Conservancy supports Policy O-8.1, which states:

Protect the visual quality of scenic hillsides, including but not limited to ridgelines, hillside slopes and natural vegetation, to preserve the integrity of existing terrain—particularly areas located at key vantage points from public roads, trails and recreation areas.

### **Significant Ecological Areas Proposed Regulatory Changes**

The comments in this section refer to the draft document from the Los Angeles County website, entitled Significant Ecological Areas Proposed Regulatory Changes, proposed as part of the General Plan Update. The Conservancy notes that the proposed SEA boundaries are substantially larger than those currently adopted. The Conservancy continues to commend the County and the consultant team on the excellent work done for designating the boundaries of the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The Conservancy also appreciates the County's efforts to incorporate some of the Conservancy's previous recommendations regarding SEA boundaries (see the Conservancy's April 30, 2001 and December 23, 2002 letters enclosed).

However, the Conservancy is concerned that the proposed changes to the SEA Regulatory Review Procedures will not provide the needed protections for either the existing or the new expanded SEAs. Notably, additional exemptions to the SEA review process have been added, and many activities would be not be required to be reviewed by Significant

Ecological Areas Technical Advisory Committee (SEATAC), nor would they require a public hearing. The proposed regulations would result in four categories of SEA review: (1) exemptions from SEA review process (no SEATAC review, no public hearing), (2) Director's Review (no SEATAC review, no public hearing), (3) Minor Conditional Use Permit (CUP) (no SEATAC review, sometimes a public hearing is required), and (4) CUP (with SEATAC review and public hearing). (According to the SEAs Proposed Regulatory Changes, these SEA regulatory procedures do not apply to those areas within the Santa Monica Mountains Coastal Zone boundary; those projects are subject to a Coastal Development Permit.)

The Conservancy stresses that a community-level Biological Constraints Analysis must be required for all development projects requiring grading of more than 5,000 sq. ft. within SEAs. This is more consistent with current requirements (as stated in County of Los Angeles Department of Regional Planning Biological Constraints Analysis Guidelines, p. 1, from the County website). This is a key step as part of a proactive approach to adequately protect SEAs. This should be required for all projects grading over 5,000 square feet (sq. ft.) of surface area within SEAs, even those proposed to be exempt from SEA review (see below).

*SEA exemptions (no SEATAC review, no public hearing):* Under the SEAs Proposed Regulatory Changes, some exemptions would include new individual single-family homes, grazing, vegetation removal less than one acre (provided that no more than one acre is removed within a single calendar year), and grading of slopes less than 8 percent (provided that no more than 2,500 cubic yards of earth is moved).

There are uncountable scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts, either individually, or cumulatively, without adequate avoidance, mitigation, or public review. For example, single family homes are being built in the Simi Hills, in or near areas known to support the rare plant, Santa Susana tarplant, without adequate environmental review. There are cases where a new single-family home may be proposed in a visually sensitive area (e.g., visible from scenic roads, trails, parkland, etc.), resulting in significant adverse project-related impacts, or resulting in significant, adverse cumulative impacts from several single-family homes being built in the area. Also, extensive grazing over a large area, can result in significant degradation to native plant communities and sensitive species. Vegetation removal of one acre per year over several years, can also result in significant loss of native habitat and watershed protection. These types of activities can be particularly problematic if the development and vegetation removal occur in sensitive habitat areas near water sources used by wildlife (such as mammals), or near a habitat linkage chokepoint. The proposed new regulations would let such projects through like a super coarse sieve.

These procedures also state that projects on parcels located partially within an SEA (provided the development area is outside of the SEA) are exempt. It appears this may allow fuel modification and other harmful indirect effects on the SEA without consideration of simple avoidance alternatives that would be obvious from a constraints report.

The SEAs Proposed Regulatory Changes document states that several of these activities are not subject to a building or grading permit, thus are not under the scrutiny of zoning review. The Conservancy recommends that the County require SEATAC review for these activities. However, if the County proceeds with considering these activities exempt, then at the very least, the following changes should be made to the SEA exemption procedure. As stated above, a biological constraints analysis should be prepared for all of these aforementioned activities resulting in grading of over 5,000 sq. ft. of surface area within SEAs. The proposed exemptions should be modified as follows:

- New single-family residences, that will result in less than 5,000 square feet of surface area grading....
- Projects on parcels partially within a SEA, provided the development area (including the fuel modification areas) is outside of the SEA, the applicant proposes and commits to implement measures to minimize indirect effects to the SEA, and the County biologist has approved these measures.
- Grazing of horses...provided that the grazing and corrals occupy less than ½ acre.
- Vegetation removal less than one ½ acre total, provided that no more than one acre is removed within a single calendar year (in all years combined on a single property)...
- Grading of land with a slope of less than 8 percent provided that no more than ~~2,500~~ 1,000 cubic yards of earth is moved.

The Conservancy recommends that at the very least the County biologist review these projects to ensure compliance with the exemption requirements.

*SEA Director's Review (no SEATAC review, no public hearing):* According to the SEAs Proposed Regulatory Changes, a "Director's review" would consist of a site visit by the County biologist, review of a checklist, and the possibility for recommended changes by the biologist, and/or recommendation to the Minor CUP process (which also does not require SEATAC review). These types of activities would have greater impacts than those proposed

under the exemption category, and they have the potential for significant, adverse environmental impacts, individually and cumulatively. The Conservancy recommends that these activities listed in this paragraph be subject to SEATAC review and that the public be afforded the opportunity to comment. If the County elects to maintain these activities in this SEA Director's Review category (with no SEATAC review and no public hearing), at the very least, the following changes should be made:

- Grading of land with a slope of less than 8 percent and over ~~2,500~~ 1,000 cubic yards but less than ~~5,000~~ 2,500 cubic yards of earth of moved.
- Vegetation removal of ~~1.0 to 2.5~~ ½ to 1.0 acre...

Also, on the checklist for those projects in the SEA Director's Review category, all streams, not just United States Geological Survey (USGS) blue-line streams, should be considered.

*Minor CUP (no SEATAC review, sometimes a public hearing is required):* The Minor CUP process would require certain Development Standards Applicable to Small Subdivisions and a Burden of Proof to be met, with no SEATAC review required. The Conservancy *strongly* recommends that all small subdivisions (4 units or less) within SEAs be required to be subject to SEATAC review, and that the public be afforded the opportunity to comment. The other activities proposed in this category should also be subject to SEATAC review, including relocation of two or more property lines between three or more contiguous parcels; grading under certain conditions, and vegetation removal under certain conditions. However, if the County proceeds with considering these activities under the proposed Minor CUP process, at the very least, the following changes should be made to the thresholds for this category, to the Development Standards Applicable to Small Subdivisions, and to the Burden of Proof.

If the County elects to maintain these activities in this category, the following changes should be made to the thresholds for this category:

- Grading of land with a slope of 8 percent or greater, but less than ~~25~~ 15 percent in an amount between ~~5,000~~ 2,500 cubic yards and ~~10,000~~ 5,000 cubic yards.
- Vegetation removal greater than ~~2.5~~ 1 acres but less than 20 percent of gross project area, or vegetation removal greater than 1 acre, but less than 2.5 acres....

Additional specificity is warranted for the phrases: "...maintain the remaining portions of the site in a natural undisturbed site..." (in l.a. Development Standards Applicable to Small

Subdivisions, p.8), and "...setting aside appropriate and sufficient undisturbed areas..." (in 2.a. Burden of Proof, p. 9). The following language should be added to these two sections:

This shall be accomplished by dedicating the land in fee simple to an appropriate public entity capable of managing open space for resource protection and recreational use, or by granting conservation easements, or recording a offer to dedicate conservation easements, to the County and to an appropriate public entity capable of managing open space for resource protection and recreational use, prior to vegetation removal or grading.

In 1.c. Development Standards Applicable to Small Subdivisions, the language appears to allow development of a majority of the floodplain or stream, as long as a small portion is not altered. This language should be clarified so as to emphasize avoidance of the majority of the floodplain or stream. From a financial investment standpoint, it seems illogical to build in the floodplain. Also, avoidance of streams is preferred to protect the biological functions and values of the stream. This language should be changed as follows:

Not alter, grade, fill or build within the ~~entire extent of the~~ hydrological floodplain or biological margins of a river corridor, a blue line stream, or other perennial or intermittent watercourse to reduce the need for bank stabilization, unless no other alternative is feasible, the floodplain and watercourse have been avoided to the maximum extent, and appropriate mitigation measures will be implemented.

The proposed 100 foot buffer around wetland areas is not sufficient (1.d. Development Standards Applicable to Small Subdivisions, p. 8) to protect functions and values of the wetland. A buffer of 200-300 feet is more appropriate given the sensitivity of wetlands and the typical buffer recommended by the California Department of Fish and Game.

*CUP (with SEATAC review and public hearing):* The SEA Regulatory Review Procedures for CUPS (including SEATAC review), should provide the highest level of protection because presumably these activities could potentially result in the greatest impacts to the SEAs. Key protections should be added to Section 2. Burden of Proof (p. 11). Additional specificity regarding land dedications and conservation easements should be added to the language in Section 2.a., "...setting aside appropriate and sufficient undisturbed areas..." The language regarding land dedications and conservation easements proposed on page 7 of this letter for the Burden of Proof for Minor CUPS should be added to the requirements for CUPS. Language from Development Standards Applicable to Small Subdivisions relating

to providing wildlife-permeable fencing (i.e., f., p. 9) should be added to the requirements for CUPs. A requirement should be added to the Burden of Proof for CUPs (Section 2.a.) so that access roads are designed to minimize disturbance and avoid and minimize impacts to sensitive resources. Also, "....protect habitat linkages and protect movement corridors" should be added to end of Section 2.e., Burden of Proof for CUPs, regarding preserving habitat connectivity. In addition, buffers of 200-300 feet to wetlands and streams should be a requirement in Section 2.d. Burden of Proof for CUPs.

*Other SEA Considerations:* The Conservancy supports the Specific Considerations for Individual SEAs (Section III., pp. 13-18 of SEAs Proposed Regulatory Changes). These include retaining connectivity and linkage values between the Santa Monica Mountains and Simi Hills, and maintaining linkages between large canyons of the Santa Monica Mountains SEA (p.17), limiting new development to outside the existing floodplain margins for the Santa Clara River SEA (p. 16), and retaining connectivity and habitat linkage values throughout the Santa Susana Mountains and Simi Hills for the Santa Susana Mountains/Simi Hills SEA (p. 18).

### **Land Use Element**

The Conservancy supports the intent of Policy L-2.2 and Policy L-3.1. Notwithstanding, the Conservancy supports the recommendation by San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy to make the following wording changes in these policies:

Policy L-2.2: Promote designs that preserve ~~significant~~ plant and animal habitats, natural scenery—including hillsides and ridgelines—cultural sites, public parklands and open space.

Policy L-3.1: ~~Promote~~ Establish improved inter-jurisdictional coordination of land use and transportation policy matters between the county, cities, adjacent counties, special districts, and regional and subregional agencies.

The following policy should be added to the Land Use Element after Policy L.2-11:

Require that it be demonstrated in development applications that developments are consistent with existing adopted plans including trails plans, parks plans, watershed plans, and river master plans.

### **Housing Element**

The Conservancy supports Policy H-5.8.A, which states in part: "Santa Monica Mountains: Limit housing due to the widespread presence of natural hazards, valuable natural resources..."

### **Circulation Element**

The Conservancy supports Goal C-6, and associated policies. This goal is a scenic highway system that preserves and enhances natural resources within its corridors while serving the public through various transportation modes and access to recreational opportunities.

Goal C-1 should be amended to read:

A balanced, multi-modal transportation system, coordinated with established and projected land use patterns, to serve the mobility needs of residents and commerce and , improve air and water quality, and protect natural resources.

The following policy should be added to the Circulation Element, after Policy C-1.6:

Site roads and utilities to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as roadkill) during continued operation of existing roadways and construction of new and expanded roadways.

The Conservancy acknowledges that the County has deleted a large portion of the extension of Pico Canyon Road from the proposed Highway Plan, compared to the existing Highway Plan, consistent with the recommendation made in the Conservancy's December 23, 2002 letter (enclosed). The Conservancy strongly recommends that this road not be extended on any County Highway Plans, or other plans.

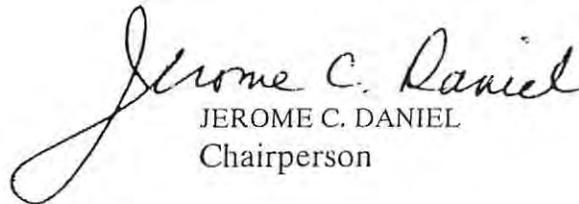
### **Safety Element**

Policy S-3.2 should be expanded to emphasize avoidance of fuel modification practices within public parklands. The following underlined language should be added:

Promote fuel modification practices that balance safety with natural habitat protection and that help reduce the risk of damaging runoff and erosion. For developments adjacent to parklands, site and design developments to allow required fire-preventative brush clearance to be located outside park boundaries unless no alternative feasible building site exists on the project site and the project applicant agrees to pay for required fuel modification within the parkland. Maintain a natural vegetation buffer of sufficient size between the necessary fuel modification area and public parkland.

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Judi Tamasi of our staff at (310) 589-3200 ext. 121 and at the above Ramirez Canyon Park address.

Sincerely,



JEROME C. DANIEL  
Chairperson

**Literature cited**

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Noss, R.F., E.T. LaRoe III, and J.M. Scott. 1995. Endangered Ecosystems of the United States: A Preliminary Assessment of Loss and Degradation. U.S. Department of the Interior, National Biological Service, Biological Report 28. February.

South Coast Wildlands Project (SCWP). 2000. Missing Linkages: Restoring Connectivity to the California Landscape-Proceedings. San Diego Zoo, San Diego. November 2.

**SANTA MONICA MOUNTAINS CONSERVANCY**

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December 23, 2002

County of Los Angeles  
Department of Regional Planning  
Attn: Mark Herwick,  
320 West Temple Street  
Los Angeles, California 90012

**Comments on Notice of Preparation for Comprehensive Update and Amendment  
to the Los Angeles County General Plan**

Dear Mr. Herwick:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Notice of Preparation (NOP) and Initial Study (IS) for Comprehensive Update and Amendment to the Los Angeles County General Plan (Project No. 02-305). The majority of the comments in this letter focus on the Significant Ecological Area (SEA) boundaries proposed in the document. (Because no additional information was provided in the NOP regarding management practices for these SEAs, we do not provide additional comments at this time regarding these.) This letter reiterates many of the comments provided by the Conservancy to Los Angeles County (County) on the Los Angeles County Significant Ecological Area Update Study 2000 documents (PCR *et al.* 2000a, 2000b) in a letter dated April 30, 2001 (enclosed).

The General Plan update effort includes the following (IS, pp. 1-2):

- Revisions to growth policies by updating population and housing projections for a new plan horizon year of 2025;
- Revisions to SEA boundaries and related policies, standards, and procedures;
- Technical conversion of land use policy maps to a digital format and realignment of boundaries to reflect assessor parcel boundaries;
- Revisions to transportation policy maps and highway plan;
- Revisions to Conservation and Open Space Element to reflect major changes in laws and current planning practices related to watershed planning and abatement of pollution from storm water runoff; and
- Revisions to boundaries of area and community plans to reflect recent city incorporations.

**Full Support for Specific SEA expansions and Some General Plan Objectives**

The Conservancy continues to commend the County and the consultant team on the excellent work done for the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The County and consultant team have made great strides in this effort and are moving in the right direction. The Conservancy continues to support the proposal to expand several existing SEAs, and to create the proposed Santa Monica Mountains, San Andreas Rim Zone, Antelope Valley, Santa Clara, and the East San Gabriel Valley SEAs. We support the additional expansion of the proposed SEAs since the SEA Update Study 2000, including a portion of the San Andreas Rift Zone SEA (in the northwest part of the County), and an area in the Castaic area near the Santa Clara River SEA (contiguous and south of the Angeles National Forest, bordered on the west by the Ventura-Los Angeles County line, and on the east by Interstate-5 [I-5]). (Please note that we look forward to providing additional comments when maps with a better scale are provided for public comments.)

The Conservancy also supports several project objectives identified in the IS, including “[p]reserve critical lands, including....strategic open lands” (IS, p. 3), and

“[p]rotect the National Forests and Santa Monica Mountains National Recreation Area for their significant natural communities, wildlife corridors, water recharge areas, and recreational opportunities...” (IS, p. 4).

**Maximum Inclusion of SEAs in Incorporated Areas**

The Conservancy’s April 30, 2001 letter recommends that the County analyze areas of existing SEAs in within City jurisdictions in the geographic limits of the County because some cities recognize the importance of SEAs in their General Plans, Zoning Ordinances, and special protective guidelines. To this end, the Conservancy supports the inclusion of the Verdugo Mountains and Tujunga Valley/Hansen Dam existing SEAs, as well as Griffith Park SEA, in the proposed SEAs (as shown on Figure 4 of the IS). These SEAs were not included in the SEA Update Study 2000. The Conservancy continues to recommend that because Ballona Creek will be studied later by a team comprised of County and City of Los Angeles appointees, a mechanism should be in place to include it later as an SEA.

**Additions to the Santa Susana Mountains/Simi Hills SEA**

The Conservancy appreciates the County’s efforts to partially incorporate the recommendations from the Conservancy’s April 30, 2001 letter to expand the Santa Susana

Mountains/Simi Hills SEA proposed in the November 2000 Update Study to include two additional areas (identified as Area A and Area B in our April 30, 2001 letter), and portions of the triangle of land north of the State Route (SR) 14 and I-5 intersection. However, we offer four main comments to fine-tune the boundaries of this SEA.

First, Santa Susana Mountains/Simi Hills SEA should be expanded to incorporate all of our proposed Area A (see April 30, 2001 letter), effectively including Browns and Mormon Canyon. Browns and Mormon Canyons are biologically critical components of the eastern Santa Susana Mountains ecosystem. Although the exact location of the proposed SEA boundary in this area is difficult to determine based on the scale of Figure 4, it appears that only part, or only the west side, of Mormon Canyon is proposed to be included in this SEA. All but a short section of Mormon Canyon is undeveloped, contributing to the ecological value of this canyon. Mormon Canyon is part of the Santa Susana Mountains ecosystem, and there appears to be no justification why half of the canyon would be cut out of this SEA. The entire canyon, including both sides of the canyon, and appropriate buffer (as shown in our proposed Area A) must be included in this SEA.

Second, Santa Susana Mountains/Simi Hills SEA should be expanded to incorporate all of our proposed Area B (see April 30, 2001 letter). The SEA should include all of the undeveloped area south of Pico Canyon, to the Old Road, up to the SEA boundary proposed in the IS. This area is ecologically important due to the presence of core wildlife habitat and high quality oak woodlands.

Third, we recommend that Santa Susana Mountains/Simi Hills SEA (or the expanded adjacent Santa Clara River SEA) be further expanded to include a critical area of the triangular habitat area north of the intersection of the north of the SR 14 and I-5 intersection (see Area C on the enclosed figures). This area is identified as a "Missing Linkage"<sup>1</sup> and preservation of the biological function of this area is essential to maintain connectivity between San Gabriel Mountains and Santa Susana Mountains. This triangle of land also contains high quality oak woodland and big-cone douglas fir.

Fourth, Santa Susana Mountains/Simi Hills SEA boundary should reflect a connection between existing SEA 64 (west of, and adjacent to I5, including the Westridge Open Space), and the remainder of the Santa Susana Mountains/Simi Hills proposed SEA (see Area D on

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<sup>1</sup>"Missing Linkages: Restoring Connectivity to the California Landscape." Conference held on November 2, 2000, San Diego, California. Proceedings written and compiled by Kristeen Penrod, South Coast Wildlands Project.

the enclosed figures). These areas are currently ecologically connected, and there appears to be no biological justification to representing them as isolated areas. (In the November 2000 Update Study, the SEA boundaries reflected these areas as connected.) The Conservancy prefers to depict the connection partially through the existing private open space on the developed Stevenson Ranch property, and partially through the Stevenson Ranch Phase V property (not yet built).

#### **Deletion of Pico Canyon Road from the Master Plan of Highways**

The Conservancy and its Joint Powers Authority, the Mountains Recreation and Conservation Authority (MRCA), cooperatively own and manage the 4,000-acre Santa Clarita Woodlands Park. Pico Canyon Road terminates within the northern portion of this park at the historic oil town of Mentryville. The ultimate alignment and width of Pico Canyon Road will be the principal determinant of whether the canyon's remaining scenic qualities are preserved.

The Conservancy recommends that Pico Canyon Road be deleted from the County's Master Plan of Highways. This recommendation is consistent with the Newhall Ranch Specific Plan Environmental Impact Report (EIR), which recommended deleting Pico Canyon south of the Specific Plan Area from the County's Master Plan of Highways. In addition, the NOP for the Stevenson Ranch Phase V project anticipates Pico Canyon Road to be a two-lane road with only minor contributions to any future project circulation needs. The owners of Stevenson Ranch Phase V property and the Southern Oaks project (Tract No. 43896) are not in favor of any further extension of Pico Canyon Road at highway design standards. This well-defined lack of future need to build Pico Canyon Road at highway standards, in combination with the regionally significant scenic, recreational, hydrological, and ecological resources of the concerned portion of Pico Canyon, dictates the protection of these public resources. Pico Canyon Road should be downgraded from a highway to a collector street on the County's Master Plan of Highways.

#### **Need for Policies to Protect Wildlife and Wildlife Movement With Respect to Roadways and Development**

The General Plan should discuss the issue of compatibility of roadways with wildlife in the Circulation Element and the Conservation and Open Space Element. Some impacts to wildlife from roadways include impeding wildlife movement and increasing road kill. Policies to avoid, minimize, and mitigate impacts to wildlife during continued operation of existing roadways and construction of new and expanded roadways should be included in the General Plan.

The General Plan must show in detail where potential habitat linkages remain to connect large regional open space areas. They should receive a special wildlife corridor designation. The General Plan would be deficient without recognizing these connections.

Specifically the General Plan should address wildlife movement across SR-14, in the stretch of SR-14 between Santa Clarita and Palmdale, in light of any proposed infrastructure improvements or development projects along SR-14. This area has been identified as a "Missing Linkage"<sup>1</sup> because it affords the potential habitat connection between the two portions of the Angeles National Forest, or between the San Gabriel Mountains and the Sierra Pelona Range.

The above-described potential habitat connection across SR-14 connects to another potential habitat connection across I-5, also identified as a "Missing Linkage"<sup>1</sup>. The General Plan should address wildlife movement across this area of I-5, north of Castaic to the Los Angeles County/Kern County line. This area provides for a potential habitat connection between the Angeles National Forest and Los Padres National Forest. The General Plan should include the following information for this potential habitat connection along I-5: the extent of open space remaining along this linkage, the presence and condition of existing underpasses, strategic potential locations for new underpasses to maximize wildlife movement, and where existing publicly-owned open space lands could complement those existing and potential new underpasses. This information is necessary to adequately analyze the impacts from any proposed infrastructure improvements or development projects along I-5, which may result from the General Plan guidelines.

### **Scenic Highway Element**

Per p. 15 of the document, the Scenic Highway Element will be rescinded and in its place, a scenic highway element will be added to the Circulation Element. This revision will eliminate most urban routes depicted in the adopted Scenic Highway Element, and will in turn focus on the scenic qualities present in rural routes (IS, p. 15). We look forward to reviewing which of these scenic highway designations will be eliminated.

### **Other Comments from Conservancy's April 30, 2001 Letter**

The Conservancy continues to make the following comments consistent with its April 30, 2001 letter:

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<sup>1</sup>"Missing Linkages: Restoring Connectivity to the California Landscape." Conference held on November 2, 2000, San Diego, California. Proceedings written and compiled by Kristeen Penrod, South Coast Wildlands Project.

- Expand the Santa Monica Mountains SEA to the east to include the eastern ridge of Mandeville Canyon through Upper Kenter Canyon to the 405 Freeway and east of the 405 Freeway to Hoag Canyon;
- Expand the proposed San Gabriel Canyon SEA westward to encompass the foothills of Altadena and Crescenta Valley to Tujunga Canyon, although the Conservancy notes that some small areas were added since the SEA Update Study 2000;
- Support Wildlife Corridor Conservation Authority's comments regarding the Puente Hills SEA;
- Apply a more comprehensive approach to designating the boundaries of the Santa Clara River SEA; and
- Consider including the Baldwin Hills as an SEA.

Thank you for the opportunity to comment on this document. We look forward to reviewing and commenting on the EIR. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,



MICHAEL BERGER  
Chairperson

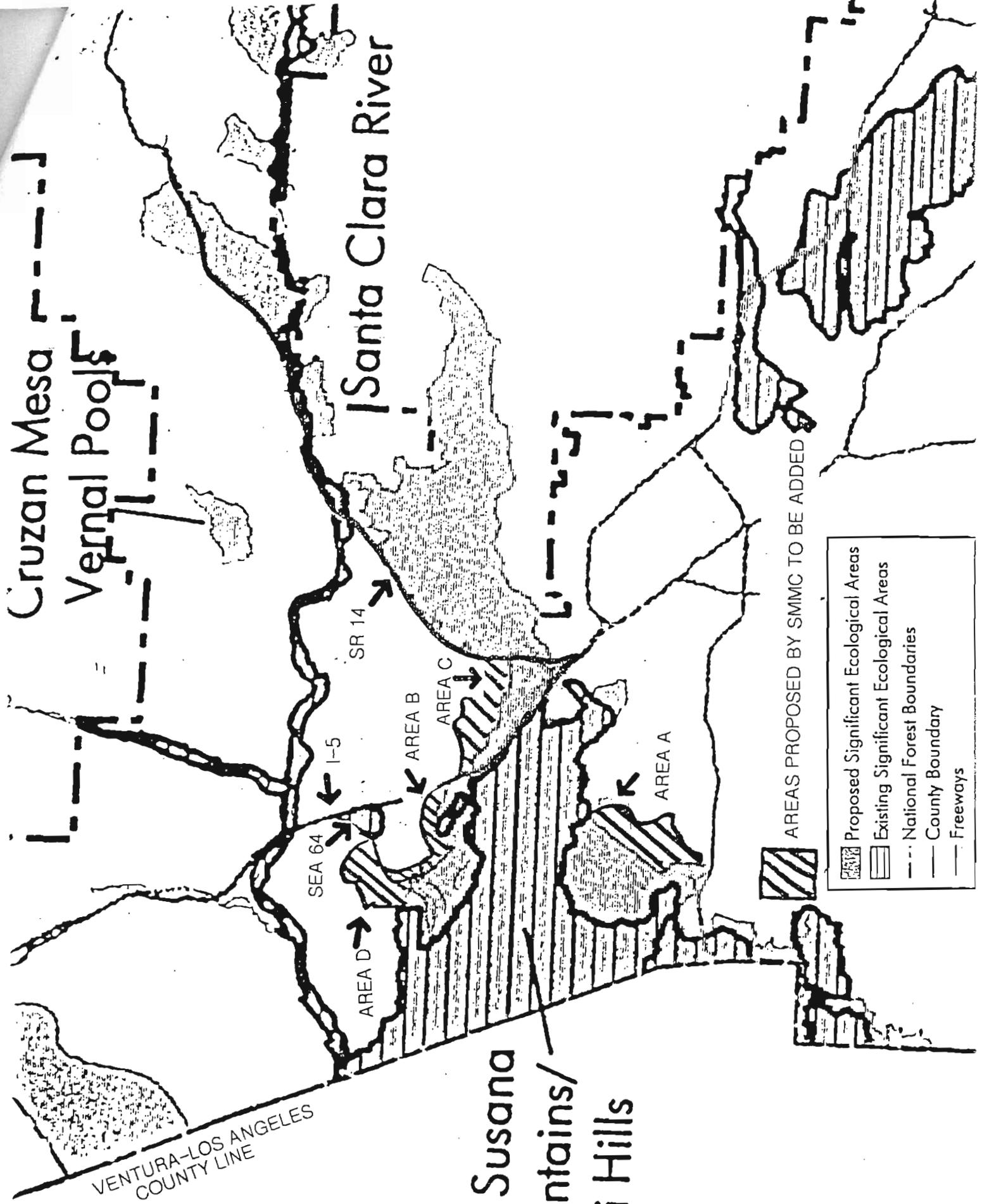
#### Literature cited

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PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. Executive Summary of the Proposed Los Angeles County Significant Ecological Areas. Prepared for Los Angeles County Department of Regional Planning. November.

Cruzan Mesa  
Vernal Pools

Santa Clara River



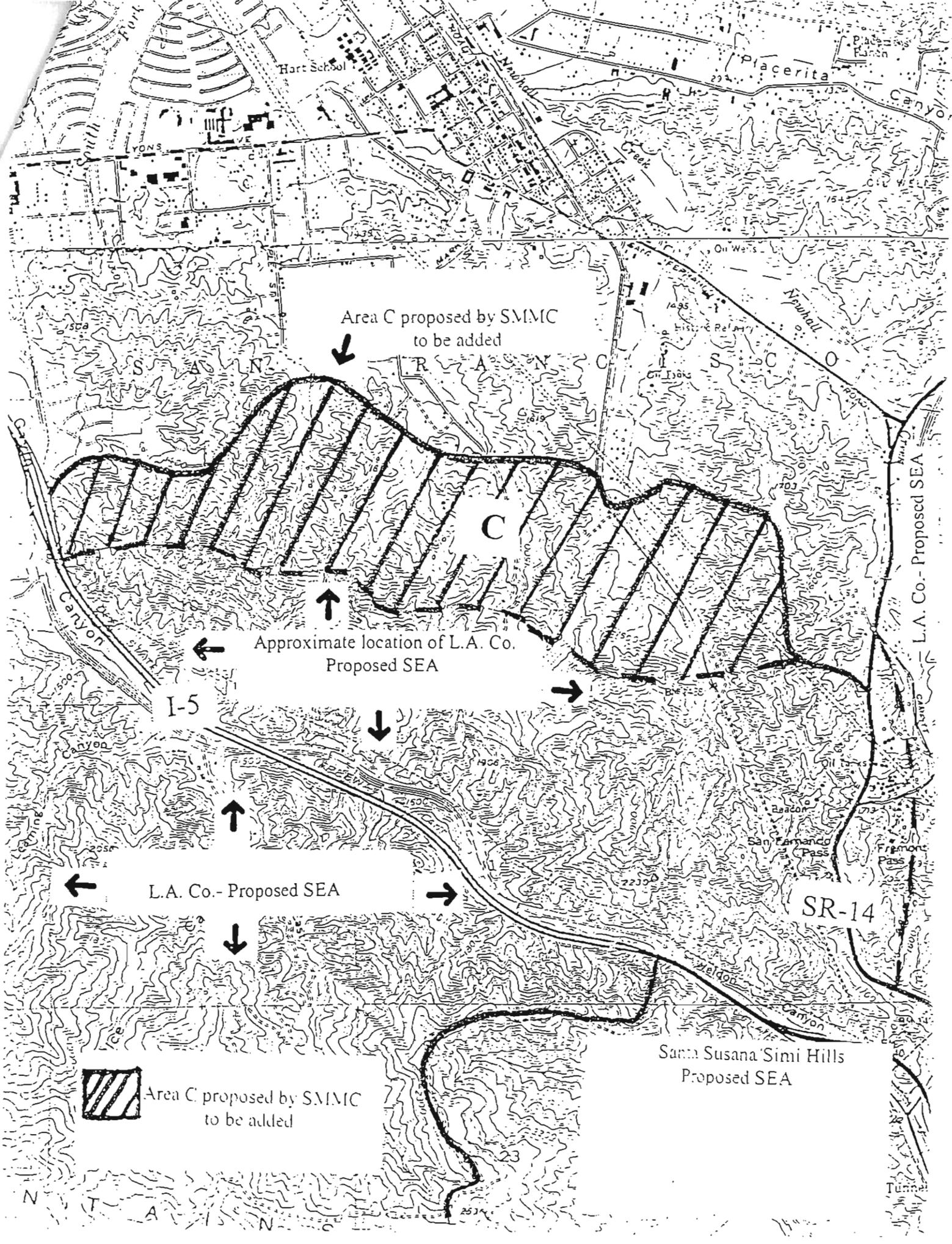
AREAS PROPOSED BY SMMC TO BE ADDED

-  Proposed Significant Ecological Areas
-  Existing Significant Ecological Areas
-  National Forest Boundaries
-  County Boundary
-  Freeways

anta Susana  
Mountains/  
Simi Hills

unty

VENTURA-LOS ANGELES  
COUNTY LINE



Area C proposed by SMMC  
to be added

Approximate location of L.A. Co.  
Proposed SEA

L.A. Co.- Proposed SEA

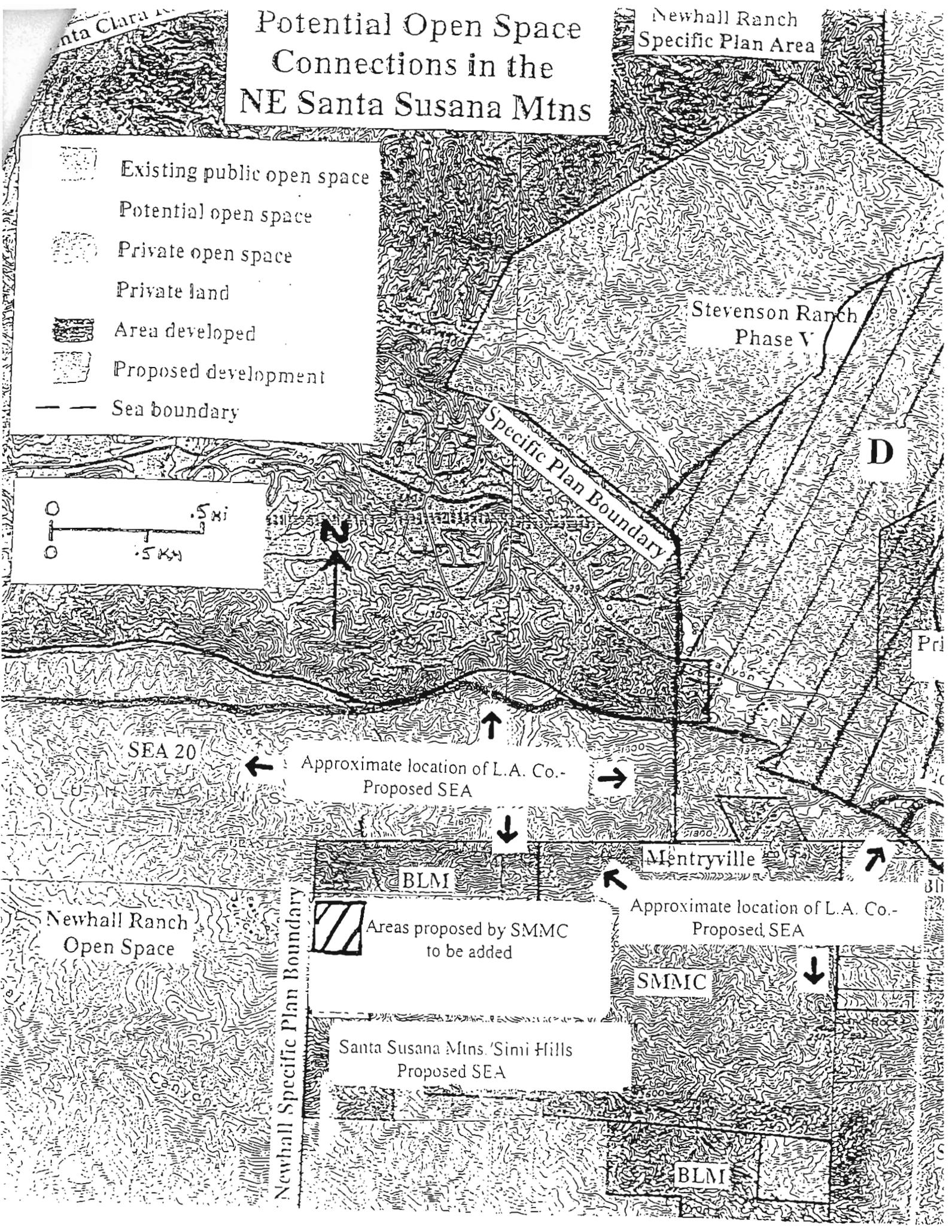
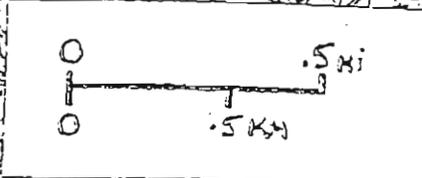
 Area C proposed by SMMC  
to be added

Santa Susana Simi Hills  
Proposed SEA

# Potential Open Space Connections in the NE Santa Susana Mtns

Newhall Ranch Specific Plan Area

-  Existing public open space
-  Potential open space
-  Private open space
-  Private land
-  Area developed
-  Proposed development
-  Sea boundary



Specific Plan Boundary

Stevenson Ranch Phase V

D

SEA 20

Approximate location of L.A. Co.-Proposed SEA

Mentryville

Approximate location of L.A. Co.-Proposed SEA

BLM

SMMC

Santa Susana Mtns./Simi Hills Proposed SEA

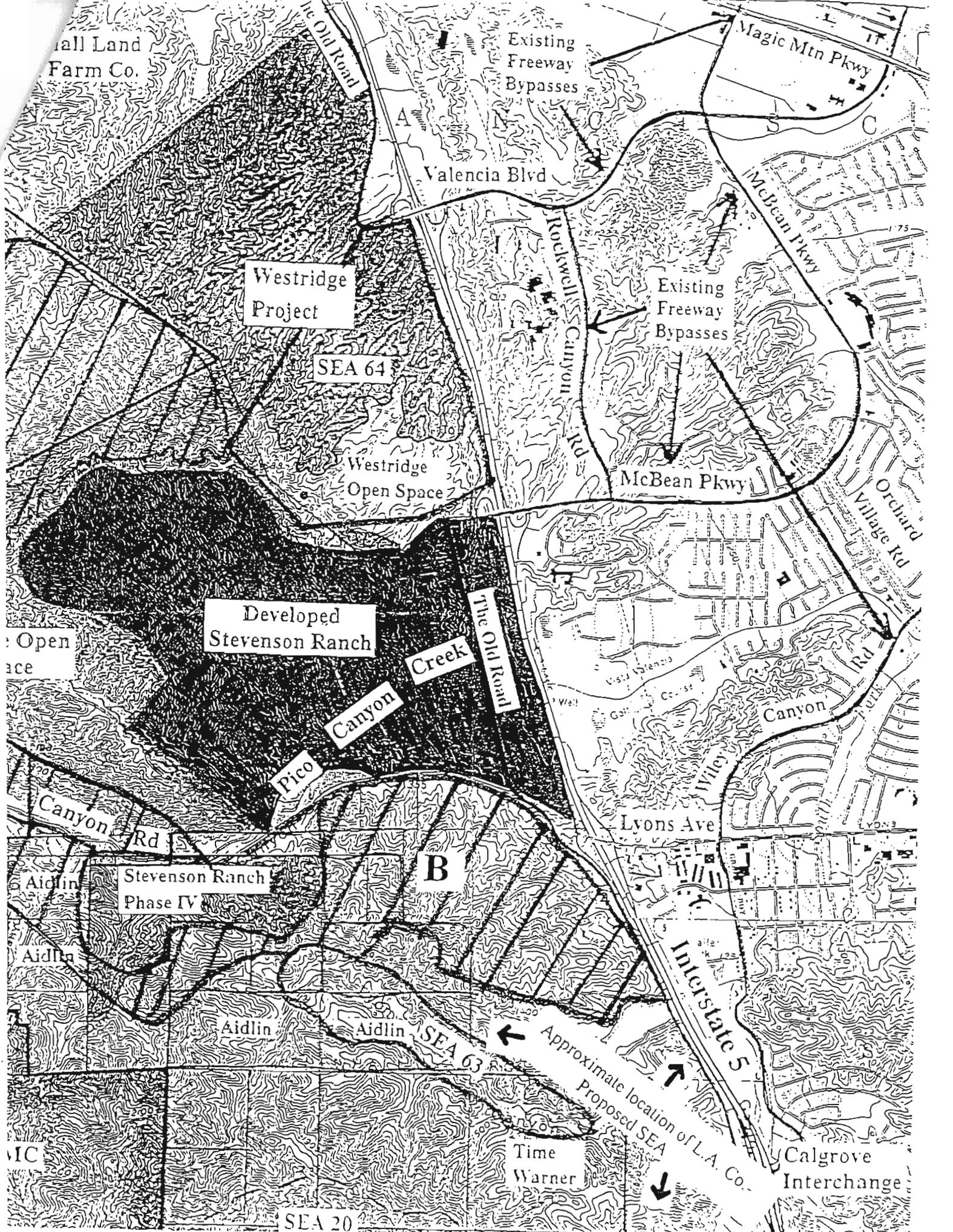
BLM

Newhall Ranch Open Space

Newhall Specific Plan Boundary



Areas proposed by SMMC to be added



Small Land Farm Co.

Existing Freeway Bypasses

Magic Mtn Pkwy

Valencia Blvd

Westridge Project

SEA 64

Westridge Open Space

Existing Freeway Bypasses

McBean Pkwy

Developed Stevenson Ranch

Creek Canyon

The Old Road

Pico Canyon

Wilcox Canyon

Lyons Ave

Canyon Rd

Stevenson Ranch Phase IV

B

Interstate 5

Aidlin

Aidlin

Aidlin

SEA 63

Approximate location of L.A. Co. Proposed SEA

Time Warner

Calgrove Interchange

SEA 20

## SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207



April 30, 2001

George Malone, Section Head  
General Plan Development Section  
Los Angeles County, Department of Regional Planning  
320 West Temple Street, Room 13<sup>th</sup> Floor  
Los Angeles, California 90012

Comments on Los Angeles County  
Significant Ecological Area Update Study

Dear Mr. Malone:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Los Angeles County Significant Ecological Area Update Study 2000 documents prepared by the consultant team for the County of Los Angeles (County) (PCR *et al.* 2000a, 2000b). The County is revising the boundaries and regulatory policies for the existing 61 Significant Ecological Areas (SEAs) as part of the General Plan update effort. The objective of the SEA program has been expanded to include the future sustainability of biotic diversity in the County through the application of more current practices in conservation biology, primarily by consolidation into larger, interconnected SEAs (PCR *et al.* 2000b).

The Conservancy commends the County and the consultant team on the excellent work done for the SEA Update Study and specifically on the efforts to propose more inclusive and biologically sound SEAs. The County and consultant team have made great strides in this effort and are moving in the right direction. The Conservancy offers the following specific comments, and we look forward to working with the County and other interested parties to include the SEAs in the General Plan as recommended by the consultants.

Full Support for Specific SEA Expansions

The Conservancy fully supports the consultants' proposal to expand several existing SEAs, including the following: Santa Monica Mountains, San Andreas Rim Zone, Antelope Valley, Santa Clara River, and the East San Gabriel Valley. The entire Santa Monica Mountains range represents the nation's premier example of a Mediterranean ecosystem and meets all of the criteria for inclusion as an SEA. The San Andreas Rim Zone encompasses several regionally significant linkages for wildlife movement and globally unique vegetation communities. The proposed Antelope Valley SEA provides crucial

connectivity for wildlife movement, encompassing open washes, historic floodplains, riparian communities, desert scrub, and Joshua tree woodlands (PCR *et al.* 2000b). Along the Santa Clara River, which is known to support numerous state and federally-listed species, the SEA boundary was proposed to be expanded along the western and northwestern edge of the Angeles National Forest, both inside and outside of the forest boundary. The proposed East San Gabriel Valley SEA contains critical habitat and a core population of the federally threatened coastal California gnatcatcher (*Polioptila californica californica*), and supports numerous plant communities restricted in distribution.

#### Maximum Inclusion of SEAs in Incorporated Areas

Some proposed SEAs that were studied included areas within a city jurisdiction while some SEAs were not studied because they occurred within a city jurisdiction. Some cities recognize the importance of existing SEAs in their General Plans, Zoning Ordinances, and special protective guidelines (PCR *et al.* 2000a). In coordination with other jurisdictions, the County should analyze the areas of existing SEAs within city jurisdictions in the geographic limits of Los Angeles County. At the very least, these areas of SEAs should be retained, as recommended by the consultant team (p. v; PCR *et al.* 2000a). For example, the Griffith Park existing SEA No. 37 was not studied because it is entirely within the City of Los Angeles jurisdiction (PCR *et al.* 2000a). Griffith Park and any remaining contiguous habitat should be included. Tujunga Valley/Hansen Dam and Verdugo Mountains existing SEAs should also be retained. In addition, because Ballona Creek will be studied later by a team comprised of the County and City of Los Angeles, a mechanism should be in place to include it later as an SEA.

#### Inclusion of Mandeville and Hoag Canyons in the Santa Monica Mountains SEA

The Conservancy recommends that the Santa Monica Mountains SEA be expanded to the east to include the eastern ridge of Mandeville Canyon through Upper Kenter Canyon to the 405 Freeway and east of the 405 Freeway to Hoag Canyon. This would provide for greater protection for the corridor used by wildlife to travel from the 405 Freeway to Griffith Park. In addition, both canyons contain core habitat values. Hoag Canyon contains the best example of sycamore and oak woodlands in the Santa Monica Mountains east of Topanga Canyon.

#### Additions to the Santa Susana Mountains/Simi Hills SEA

The Conservancy recommends adding to the proposed Santa Susana Mountains/Simi Hills SEA an area encompassing Browns Canyon and part of Mormon Canyon (see Enclosure).

Browns and Mormon Canyons are biologically critical components of the eastern Santa Susana Mountains ecosystem. With the exception of adjacent Devil Canyon, all other drainages on the southern-face of the Santa Susana Mountains within Los Angeles County are developed along their full lengths. Together, the Browns and Devil Canyon watersheds form the most ecologically rich block of habitat in this portion of the mountain range.

We concur with Don Mullally (see February 10, 2001, comment letter) that the wildlife corridors at Fremont Pass and Newhall Pass, located north of the intersection of the 14 and 5 Freeways, and connecting the San Gabriel Mountains to the Santa Susana Mountains, should be added to one of the SEAs (e.g., Santa Susana/Simi Hills SEA). This triangle of land between the San Gabriel Mountains and the Santa Susana Mountains is essential to maintain connectivity between the ranges. Over 75% of the undeveloped land in this triangle is of SEA quality with high quality oak woodland and big-cone douglas fir. We also concur with Mr. Mullally that the discussion of plant communities for the Santa Susana Mountains should be more extensive, including such plant communities as big-cone douglas fir associations, walnut woodlands, and native grasslands.

The Conservancy recommends that portions of the Pico Canyon watershed, as shown on the Enclosure, be included in this SEA. Much of this land is adjacent to extensive public ownership and is part of the core habitat area comprising the adjacent SEA.

#### Expansion of San Gabriel Canyon SEA to include Altadena and La Crescenta Foothills

The Conservancy recommends that the proposed San Gabriel Canyon SEA be expanded westward to encompass the foothills of Altadena and Crescenta Valley to Tujunga Canyon. This proposed expansion encompasses pristine chaparral, oak woodland, and riparian canyon bottoms. For example, Lower Millard Canyon in the Altadena foothills contains dense riparian woodland and heritage oak trees on upland shelves. These woodlands support a rich variety of warblers and other locally rare birds, reptiles, and amphibians. Animal species are able to move to different elevations in these canyons in response to seasonal changes and longer-term conditions such as drought.

These foothills of the San Gabriel Mountains provide for essential east-west wildlife habitat linkages between the north-south trending canyons. The SEA boundary must be moved westward to provide a complete east-west linkage system. An adequate lower elevation habitat linkage system is not contained in the higher elevation Angeles National Forest.

Concurrence with WCCA

The Conservancy concurs with the Wildlife Corridor Conservation Authority's recommendations adopted by their Governing Board regarding the proposed Puente Hills SEA in their May 2001 letter to the County.

Use Watershed Approach on Santa Clara River SEA

California Native Plant Society (CNPS) has recommended utilizing a watershed approach to define the SEAs. This approach should be considered by the County, particularly for the proposed Santa Clara River SEA. The Santa Clara River watershed including the river proper, surrounding upland areas, and tributaries have been documented to support numerous listed and otherwise sensitive species (PCR *et al.* 2000b). These species depend on substantial portions of undisturbed watershed. For this reason, the SEA must include additional drainages and slopes surrounding the Santa Clara River proper.

The Conservancy has previously commented to the County in reference to the Newhall Ranch Specific Plan and Draft Environmental Impact Report that a specific area be must be preserved (letter dated February 11, 1997). This includes a continuous habitat connection and natural land-trail corridor linking the existing Santa Clara River SEA No. 23 and the northern tip of the existing Santa Susana Mountains SEA No. 20. This also includes a prominent ridgeline, that defines the northern boundary of the existing SEA 20, separating the East Fork of Salt Canyon from the principal Potrero Canyon development area. It appears that the proposed Santa Clara River SEA contains this area, but it is difficult to determine this based on the maps provided. We request that this be verified by the County.

Inclusion of a Baldwin Hills SEA

The Land Capability/Suitability Study SEA Report (England and Nelson 1976), lists Baldwin Hills as SEA No. 38, but does not appear to be addressed in the SEA Update Study. The County and the Conservancy are members of the Baldwin Hills Regional Conservation Authority formed to coordinate open space preservation actions in the Baldwin Hills. A new state agency, the Baldwin Hills Conservancy, was established in January of this year. The Baldwin Hills supports a reasonably extensive example of coastal sage scrub left in the Los Angeles Basin. Coastal sage scrub is a California Department of Fish and Game sensitive rare natural community that has been reduced in range significantly and the Baldwin Hills would likely meet the criteria for an SEA.

### Support for Implementation of Land Use Management Practices Guidelines

Comprehensive Land Use Management Practices are recommended for all projects within SEAs, along with specific management practices for each proposed SEA (PCR *et al.* 2000a). These general and specific guidelines include limiting the percentage of disturbance in the SEAs to no more than 20 percent, providing buffers for rare plant communities such as riparian forests, and limiting the density of development in the SEAs. The Conservancy agrees that land use management guidelines such as those proposed in the SEA documents, or ones which provide even more protection, must be implemented to preserve the integrity of the SEAs.

We also support CNPS's recommendation that additional ordinances be considered. These ordinances should be explored further and could include the Land Use Management Practices Guidelines in the subject document and CNPS's specific recommendations. In particular, they should include: requiring wildlife-friendly fencing in linkages or corridors, preserving habitat, requiring publicly-held conservation easements on ungraded land, as well as limiting impermeable surface area.

### Expansion of Selection Criteria to Include Other Sensitive Species

Although the revised draft of selection criteria has already been distributed for review (p. 9; PCR *et al.* 2000a), please consider the following comment. Criterion A is limited to "the habitat of core populations of endangered or threatened plant or animal species," and does not include rare, candidate or proposed species. It would be logical to focus planning and resources on protecting core populations of rare species, in addition to threatened and endangered species, in order to reduce the likelihood of these species becoming listed in the future. The Conservancy also recommends adding "species previously thought be extinct" to this criterion. In the rare and fortunate event that a species that was previously thought to be extinct is rediscovered, that species would merit maximum protection, including designating the area which it inhabits as an SEA.

LA County SEA Update Study  
April 30, 2001  
Page 6

Thank you for the opportunity to comment on this document. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,



MICHAEL BERGER  
Chairperson

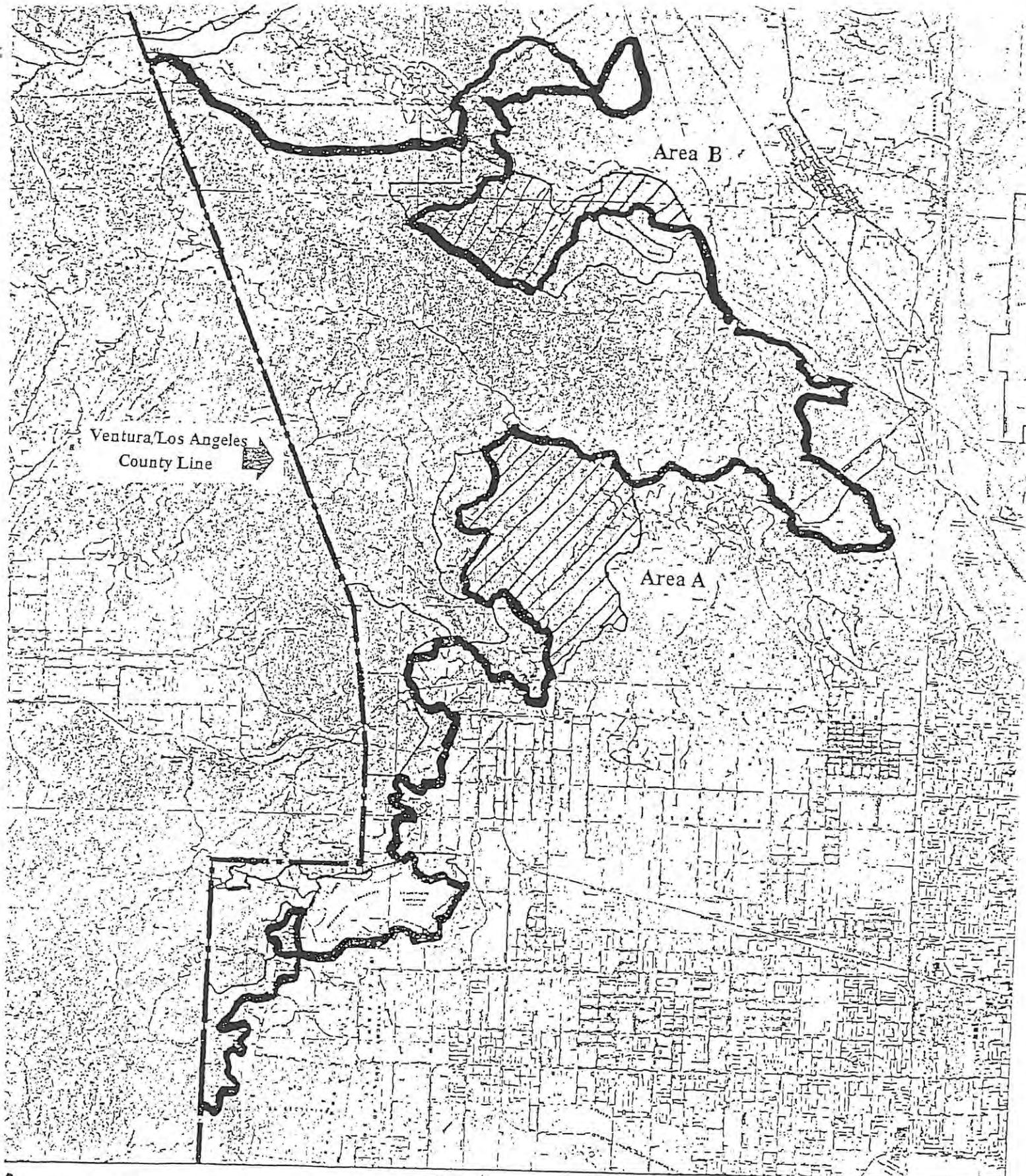
Enclosures (3)

Literature cited

England and Nelson Environmental Consultants. 1976. Land Capability/Suitability Study Los Angeles County General Plan Revision Program Significant Ecological Areas Report. Prepared for Los Angeles County Department of Regional Planning and Environmental Systems Research Institute.

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PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. Executive Summary of the Proposed Los Angeles County Significant Ecological Areas. Prepared for Los Angeles County Department of Regional Planning. November.

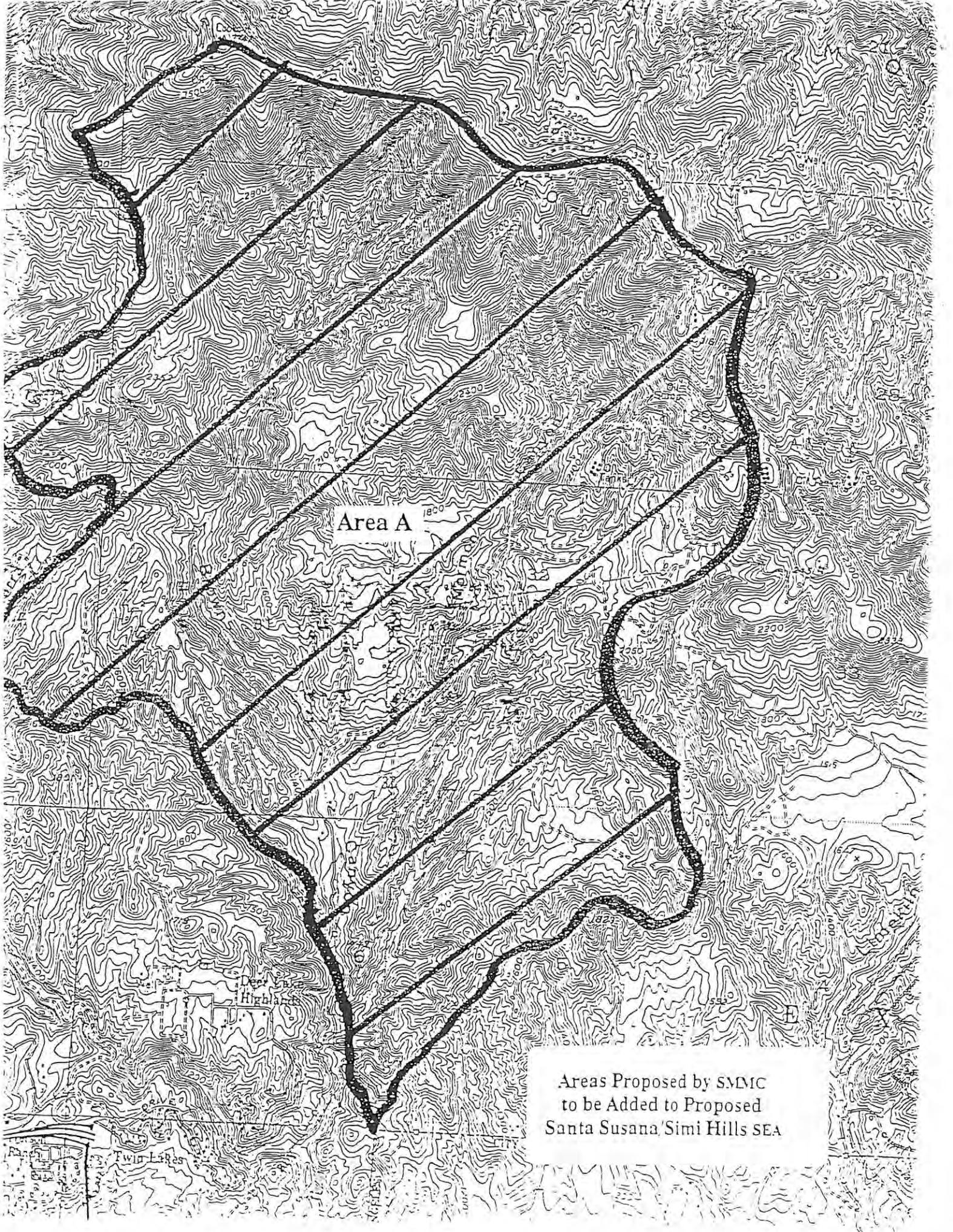


 Proposed SEA Boundary  
 Existing SEA Boundary  
 Angeles National Forest

  
 Areas Proposed by SMMC  
 to be Added to Proposed  
 Santa Susana/Simi Hills SEA

Figure 2  
 Santa Susana Mountains/Simi Hills  
 Significant Ecological Area  
 Existing and Proposed Boundaries

  
 9400  
 Feet  
 FORMA Systems  
 10/24/00



Area A

Areas Proposed by SMNC  
to be Added to Proposed  
Santa Susana/Simi Hills SEA





To Ms. Thuy Hua  
 County of Los Angeles  
 Department of Regional Planning



9-6-11

**Los Angeles County General Plan and Antelope Valley Area Plan Updates  
 Draft Environmental Impact Report (EIR) Scoping Meeting  
 September 6, 2011**

**Written Comment Form**

The purpose of the public scoping meeting is to obtain input from the public regarding the scope and the alternatives that will be analyzed in the Draft EIR for Los Angeles County General Plan and Antelope Valley Area Plan Updates. The proposed project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update and Antelope Valley Area Plan Update focus growth in the unincorporated areas with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas. The project will replace the adopted General Plan (excluding the Housing Element, adopted in 2008) and the adopted Antelope Valley Area Plan.

A Notice of Preparation (NOP) for the Draft EIR, which describes the project and outlines the potential environmental impacts, has been prepared. The NOP is available for review from August 15, 2011 to September 14, 2011 on the Department of Regional Planning's website at <http://planning.lacounty.gov/generalplan> and <http://planning.lacounty.gov/tnc>. Copies of both Draft Plans can be found online at <http://planning.lacounty.gov/>.

Comments can be provided verbally at the scoping meeting or in written form. Anyone wishing to make formal comments on the NOP must do so in writing. The deadline for submitting written comments to the County is **5:00pm Wednesday, September 14, 2011**. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope of the Draft EIR for the proposed project. Your comments will then be considered during preparation of the Draft EIR.

Sect 15 T4N R8W APN 3064-016-021 80 acres

Jesus Cyn runs across the corner of our property. It is NOT an accepted Road. We've owned our land since 1967 and it seems like you are taking it away from us.

W/O The map of land uses / ~~the~~ proposed zones How can we comment I spent 3 1/2 Hours at the Agoura Hills library & I still don't know what I can do w/ my land.

If I am in a flood zone isn't it ridiculous in Mtn area w/ rain average (NOP yours) of less than 9" per year

What were the 3 species you are focused on.

Name: Mary Justice Room & address downtown to see proposed land use.

Address: 3998 Avenida Verano

City/Zip Code: Thousand Oaks, CA 91360

Telephone/E-mail: ATTANIA7@gmail.com

APN 3064-016-021

Please leave this form in the box provided or deliver or mail it to Ms. Thuy Hua, AICP, Senior Planner, Los Angeles County, Department of Regional Planning, 320 W. Temple Street, Room 1354, California 90012. This form can simply be folded and placed in a mailbox. Please remember to add postage.

## Town\_Country

---

**From:** Gunzel, Kurt [kgunzel@cityoflancafterca.org]  
**Sent:** Thursday, September 08, 2011 11:09 AM  
**To:** Town & Country  
**Subject:** NOP Written Comment Regarding Update of the Antelope Valley Plan

To whom this matter concerns:

I was involved in a number of meetings back about 2-3 years ago regarding the plan to update the Antelope Valley Plan at which time I brought up at public meetings, separate meeting with County representatives and comments made in writing regarding questions I had regarding the affects of the plan for the area.

The area of particular concern is specifically in the Quartz Hill community around 45<sup>th</sup> West and K-8. Zoning is A-1-10,000 with a general plan designation that limited development to 1 unit per acre at the time. Previously the County allowed subdivision to the limits of the a-1-10,000 zoning, as was reflected in the actual development pattern until the more restrictive land use. We were told the restriction was due to some issues the county needed to investigate relative to drainage and before this could be addressed for development purposes the area would be effectively restricted from development at the zoning density. The land use designation restricted development to the overlaid zoning which was not consistent with the current or prior development pattern. Maps that I presented to the County reflected lots in the area developed down to the 10,000 square foot lot size consistent with a higher density.

I own property in this area which is why I have interest in the development that would be allowed. Properties adjacent to the west were subdivided in I believe the mid 70s to 15,000 square feet which was reflective of what we were also proposing with the subdivision map we submitted. Properties to the North have been developed down to 10,000 square feet and properties adjacent and North and South of our property range from a half acre to less than an acre.

In talking to County representative we were encouraged to do a local plan amendment, which was initiated and filed several years ago along with a subdivision map to create 15,000 square foot lots, but due to difficult times and unsurity in the economy we were unable to proceed due to loss of employment and difficulties a dissolution of a partnership I was not in a position to move forward financially. Plus the other option was to address the issue through the plan amendment at the time which was on the horizon. I tried to stay involved when I heard anything about the update to the plan and was actually sent information and correspondence until about two years ago when I didn't hear any more about the update, until the more recent scoping meeting which I unfortunately was unable to attend.

My question is what would be the procedure, at this time to see if the General Plan designation could go back to reflecting what was the development pattern for years (lots below 1 acre limit) and consistent with the actual underlying zoning of a-1-10,000.

The higher density was what our original subdivision proposal was several years back where we actually went thru a number of levels of staff review to approve our project at 15,000 square foot lots? The one-acre minimum designation just doesn't make sense as the area is developed with smaller parcels throughout the area and the larger rural lots is no longer consistent with the development that has occurred and is also an underutilization of property and wasteful of resources in light of the more recent infill development that has occurred during the last couple decades and what was encouraged by the County through the previous plan. Would appreciate the County's consideration of this and any information or suggestions that you can offer.

Thank you,  
Kurt and Susan Gunzel



**LAND DESIGN CONSULTANTS, INC.***Land Planning, Civil Engineering, Surveying & Environmental Services*

September 7, 2011

Ms. Thuy Hua  
Senior Regional Planner  
County of Los Angeles Department of Regional Planning  
320 W. Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Town & Country Notice of Preparation (NOP) & Town and Country Area Wide Update (Antelope Valley Area Wide General Plan)

Dear Ms. Hua

On behalf of MDM Gorman Post Ranch LP., we are responding to the County's Notice of Preparation (NOP) for the Environmental Impact Report for the County's proposed Town & County update of the Antelope Valley Area wide General Plan. MDM owns approximately 2,720 acres of land (within 17 parcels) in the Gorman Area located on Gorman Post Road between the Town of Gorman and Highway 138. (APN 3251-001-018, 019; 3252-002-001; 3252-016-019. 024; 3252-003-014; 3252-004-010; 3252-004-013; 3252-005-001; 3251-017-005; 3252-009-002, 003; 3252-009-001; 3252-010-007; 3252-008-011 & 3252-010-011)

The project know as Vesting tentative Tract map 62053, County case Number 200500016 was originally filed with the County in 2005 and has been an active project with the latest plan revisions filed with the Department of Regional Planning on March 10, 2011. The project 1<sup>st</sup> Screen Check Environmental Impact report (DEIR) was submitted to the County in October 2007. The current Antelope Valley Area wide General Plan has designated the property As N-1 Non-Urban hillside Management Area & SEA

The Proposed Town & Country update is proposing changing the Land Use Designation from N-1 Non-Urban Hillside to RL 20 - Rural Land 20 (1du/20acres) and RL 40 - Rural Land 40 (1du/40 acres) considerably reducing the allowable density. The proposed Town & Country update has designated the Gorman Area as a "**Rural Town Center Area**" and is proposing increasing the Commercial Land Use designation (CR - Rural Commercial) on the adjacent property located south westerly of the property between the I 5 freeway and Gorman Post Road.

The property owner is objecting to the Land Use Designation changes from N-1 (non-urban hillside) to RL20- Rural Land 20 (1du/20acres) & RL40 - Rural land 40 (1du/40 acres). The property owner's development team has been in the entitlement process for over seven (7) years and request the proposed Land Use Changes be more consistent with the Current Antelope Valley Area Wide Plan and the project be identified in the Plan as a pending application as part of the Town & Country plan update. The property is located and takes access from a County designated Secondary

Ms. Thuy Hua  
County of Los Angeles

September 7, 2011  
Page 2 of 2

Highway (Gorman Post Road) and is within the influence area of the proposed "Rural Town Center Area" designation for Gorman, and is in close proximity to over 145 acres of commercially designated lands all located within the I 5 Freeway and Highway 138 corridor.

It is our belief that the Gorman Community should be provided with a greater mix of residential and commercial uses with the direct access along the I 5 Freeway and Highway 138 corridors. To provide this mix of housing a "Rural Town Area" should be designated to provide an appropriate transition between the "Rural Town Center Area" and the "Rural Preserve Area". This would be consistent with directing future growth around the "Rural Town Center Area" designation for the Town of Gorman and its ability to support future commercial along this portion of I 5 Freeway Corridor.

This important economic link at Gorman with the Antelope Valley (HWY 138) must be promoted and not diminished. The planning of this area needs to promote service and other support necessary to insure this vital link. Similarly, the Major economic link along Interstate 5 must be supported by all essential services as junctions like this, including residential along with preservation.

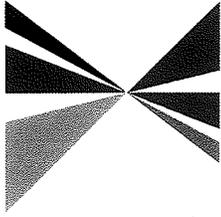
We look forward to working with County on the Town & Country update and the appropriate Land Use Designation for the property and the Gorman Area.

Sincerely,  
LAND DESIGN CONSULTANTS, INC.



Steve Hunter  
Vice President

- C. Mark Majer/MDM Gorman Post Ranch LP
- Ian Harvey/ MDM Gorman Post Ranch LP
- Bryan Avilla/ MDM Gorman Post Ranch LP



**ASSOCIATION of GOVERNMENTS**

August 29, 2011

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Margaret Clark, Rosemead
- Transportation  
Paul Glaab, Laguna Niguel

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County General Plan and Antelope Valley Area Plan Update [I20110081]**

Dear Connie Chung and Thuy Hua:

Thank you for submitting the **Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County General Plan and Antelope Valley Area Plan Update [I20110081]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impact Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Section 65080 and 65082.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act (CEQA) Guidelines, Sections 15125 and/or 15206. The proposed project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan to accommodate new housing and employment opportunities in anticipation of population growth in Los Angeles County and the region.

Policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Visioning (CGV) that may be applicable to your project are outlined in the attachment. The RTP, CGV, and table of policies can be found on the SCAG web site at: <http://scag.ca.gov/igr>. For ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format (example attached).

The attached policies are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. **When available, please send environmental documentation ONLY to SCAG's main office in Los Angeles and provide a minimum of 45 days for SCAG to review.** If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895 or [leep@scag.ca.gov](mailto:leep@scag.ca.gov). Thank you.

Sincerely,

Jacob Lieb, Manager  
Environmental and Assessment Services

**COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL  
IMPACT REPORT FOR THE LOS ANGELES COUNTY GENERAL PLAN AND  
ANTELOPE VALLEY AREA PLAN UPDATE [I20110081]**

**PROJECT LOCATION**

Los Angeles County is approximately 4,083 square miles, stretching 75 miles along the Pacific Coast of Southern California and bordered to the east by Orange County and San Bernardino County, to the north by Kern County and to the west by Ventura County. The County also includes two off-shore islands, Santa Catalina Island and San Clemente Island.

Unincorporated areas account for approximately 65 percent of the total land area of the County. The northern unincorporated areas in the County are sparsely populated and include two national forests and the Mojave Desert. The unincorporated areas in the County's southern portion consist of 58 noncontiguous land areas, referred to as the County's unincorporated urban islands.

Antelope Valley Planning Area is located in the northern portion of the County, bounded by Kern County to the north, Ventura County to the west, the Angeles National Forest to the south and San Bernardino County to the east. The area covers approximately 1,800 square miles and includes two dozen communities.

**PROJECT DESCRIPTION**

The proposed project is a comprehensive update of the Los Angeles General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs, and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update and Antelope valley Area Plan Update focus growth in the unincorporated areas with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas.

**Draft General Plan**

The proposed project is the preparation of a comprehensive update of the County's 1980 General Plan that meets California Code requirements for a general plan. The Draft Los Angeles County General Plan accommodates new housing and jobs within the unincorporated area in anticipation of population growth in the County and the region through the year 2035. The Draft General Plan has been designed to utilize, promote and implement policies that promote healthy, livable and sustainable communities, providing the framework of goals and policies to achieve countywide planning objectives and serves as the foundation for all existing and future community-based plans.

**Draft Antelope Valley Area Plan**

The proposed project will also replace the existing Antelope Valley Area Plan, a component of the Los Angeles County General Plan. The Area Plan addresses specific issues relevant to the Antelope Valley such as community maintenance and appearance, preservation of rural character, open space and agricultural lands and provides more specific guidance on General Plan elements. The Draft Area Plan also replaces all elements and the land use policy map.

**CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN**

**Regional Growth Forecasts**

The DEIR should reflect the most current SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion and city are as follows:

**Adopted SCAG Regionwide Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

**Adopted Los Angeles County Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	1,188,321	1,282,624	1,378,396	1,471,608	1,561,983	1,648,694
Households	325,615	357,468	391,383	417,848	443,414	464,468
Employment	320,171	336,371	346,717	358,881	371,868	384,300

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008. City totals are the sum of small area data and should be used for advisory purposes only.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that may be pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

***Regional Transportation Plan Goals:***

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

**GROWTH VISIONING**

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region’s mobility, livability and prosperity. The following “Regional Growth Principles” are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

**Principle 1: Improve mobility for all residents.**

- GV P1.1 *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2 *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3 *Encourage transit-oriented development.*
- GV P1.4 *Promote a variety of travel choices*

**Principle 2: Foster livability in all communities.**

- GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2 *Promote developments, which provide a mix of uses.*
- GV P2.3 *Promote "people scaled," walkable communities.*
- GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

**Principle 3: Enable prosperity for all people.**

- GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2 *Support educational opportunities that promote balanced growth.*
- GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5 *Encourage civic engagement.*

**Principle 4: Promote sustainability for future generations.**

- GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
- GV P4.2 *Focus development in urban centers and existing cities.*
- GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 *Utilize "green" development techniques*

**CONCLUSION**

As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here:

[http://www.scag.ca.gov/igr/documents/SCAG\\_IGRMMRP\\_2008.pdf](http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf)

**SUGGESTED SIDE BY SIDE FORMAT - COMPARISON TABLE OF SCAG POLICIES**

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggested format is as follows:

The complete table can be found at: <http://www.scag.ca.gov/igr/>

- Click on “*Demonstrating Your Project’s Consistency With SCAG Policies*”
- Scroll down to “*Table of SCAG Policies for IGR*”

SCAG Regional Transportation Plan Goals and Compass Growth Visioning Principles  
Regional Transportation Plan Goals

Goal/ Principle Number	Policy Text	Statement of Consistency, Non-Consistency, or Not Applicable
RTP G1	Maximize mobility and accessibility for all people and goods in the region.	<b>Consistent:</b> Statement as to why <b>Not-Consistent:</b> Statement as to why or <b>Not Applicable:</b> Statement as to why
RTP G2	Ensure travel safety and reliability for all people and goods in the region.	<b>Consistent:</b> Statement as to why <b>Not-Consistent:</b> Statement as to why or <b>Not Applicable:</b> Statement as to why
RTP G3	Preserve and ensure a sustainable regional transportation system.	<b>Consistent:</b> Statement as to why <b>Not-Consistent:</b> Statement as to why or <b>Not Applicable:</b> Statement as to why
Etc.	Etc.	Etc.

September 9, 2011

They Hue, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Ms. Hue:

I am hereby responding to the above stated Notice of Preparation (NOP). I am opposed to exclusively utilizing the proposed goals, policies, implementing programs, land use designations (density and intensity) in the Draft Antelope Valley Area Plan: Town & Country (Draft Plan) for the Environmental Impact Report (EIR) study. The Draft Plan is currently under active review by the community, and has not yet been fully vetted for use in an EIR. Accordingly, I am requesting the EIR study include the range of land use designations associated with the current Land Use Plan and the Draft Plan.

Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, I have a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The down zoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. In 2010 the median home sales price in the high desert was \$125,550 and was the most affordable housing region in the State, during a time when the County median sales price was \$346,840. The down zoning resulting from the proposals found in the Draft Plan must result in an up zoning in other, less-affordable areas, as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County will be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented.

Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

Government agencies implementing SB 375 should not regard development, or the prohibitions of development, as the sole solutions for meeting their Greenhouse Gas (GHG) emission reduction target. Housing affordability, construction costs and other economic impacts must be considered when evaluating measures proposed for meeting the goals of SB 375.

As stated in the Notice,

“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of my request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, I request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,

Steve Burton RDC-PRO  
Keller Williams Realty  
The Burton Team  
1401 W Rancho Vista Blvd.  
Palmdale Ca. 93551

Off: 661-274-8300  
Cell: 661-857-0440  
fax: 866-529-5281  
sburton@kw.com  
DRE# 00921720

## Town Country

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**From:** Ann Trussell [ann@antrussell.com]  
**Sent:** Sunday, September 11, 2011 1:37 PM  
**To:** Town & Country  
**Cc:** fifthdistrict@lacbos.org  
**Subject:** Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

September 11, 2011

Michael D. Antonovich  
Fifth District Supervisor  
Los Angeles County Supervisor  
500 West Temple Street, Room 869  
Los Angeles, CA 90012

**Thuy Hua, AICP, Senior Regional Planner**  
**Los Angeles County Department of Regional Planning**  
**320 West Temple Street, Room 1354**  
**Los Angeles, CA 90012**

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Supervisor Antonovich and Ms. Hua:

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Sincerely,

Ann Trussell, DRE 01101515  
REALTOR, GRI, e-Pro, SFR  
Short Sales & Foreclosure Resource

HOMEBASED REALTY  
42402 10TH Street West, Suite J  
Lancaster, CA 93534  
661-269-0991  
Cell 661-713-2358  
[ann@antrussell.com](mailto:ann@antrussell.com)

September 9, 2011

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

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## Notice of Preparation of EIR Response

Thuy Hua

Page 2

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As stated in the Notice,

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The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of my request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, I request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,



Broker Assoc

Keller Williams AV Realty

213 626-0434

213 974-1010

September 9, 2011

Ms. Thuy Hua  
Senior Regional Planner  
County of Los Angeles Department of Regional Planning  
320 W. Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Town & Country Notice of Preparation (NOP) & Town and Country Area Wide Update  
(Antelope Valley Area Wide General Plan)

Dear Ms. Hua,

MDM Gorman Post Ranch LP is the owner of approximately 2,720 acres of land (within 17 parcels) located on Gorman Post Road between the Town of Gorman and Highway 138. (APN's 3251-001-018, 019; 3252-002-001; 3252-016-019, 024; 3252-003-014; 3252-004-010; 3252-004-013; 3252-005-001; 3251-017-005; 3252-009-002, 003; 3252-009-001; 3252-010-007; 3252-008-011 & 3252-010-011). As property owners and applicant for the Gorman Post Ranch Project, we are responding to the County's Notice of Preparation (NOP) for the Environmental Impact Report for the proposed Town & County update of the Antelope Valley Area wide General Plan.

The Gorman Post Ranch Project, identified as Vesting Tentative Tract Map 62053 (County Case Number 200500016), was originally filed in 2005 and has been an active project with the latest plan revisions filed with the Department of Regional Planning on March 10, 2011. The Project's First Screen Check Environmental Impact Report (DEIR) was submitted to the County in October 2007. The current Antelope Valley Area wide General Plan has designated the property as N-1 Non-Urban Hillside Management Area & SEA.

The Town & Country update proposes a change in Land Use Designation from N-1 Non-Urban Hillside to RL 20 - Rural Land 20 (1du/20 acres) and RL 40 - Rural Land 40 (1du/40 acres), considerably reducing the allowable density. At the same time and seemingly inconsistent with the decrease in land use intensity proposed for our property, the current version of the Town & Country update has designated the Gorman area as a "Rural Town Center" and is additionally proposing increasing the commercial land use designation on the adjacent property located southwesterly of the Gorman Post Ranch property between the I-5 freeway and Gorman Post Road.

Our development has been in the entitlement process for over six (6) years and we request the proposed land use changes be more consistent with the current Antelope Valley Area wide Plan. The property is accessible from a County designated Secondary Highway (Gorman Post Road) and is within the immediate influence area of the proposed "Town Center" designation for Gorman. It is also in close proximity to over 140 acres of commercially designated lands all located within the I-5 freeway and Highway 138 corridor.

In the Notice of Preparation document for the Los Angeles County General Plan Update and Antelope Valley Area Plan Update, the County states under the Rural Preservation Strategy that there are three types of environments - Rural Town Center Areas, Rural Town Areas and Rural Preserve Areas. Rural Town Areas are described as areas that provide a transition between Rural Town Center Areas and Rural Preserve Areas. They are to be occupied by a mix of residential and light agricultural uses and the majority of new residential development should be directed to these areas. The County additionally states "**that allowable residential densities in these areas will generally be equal to, or greater than, allowable residential densities in the current Area Plan**".

The County has designated the town of Gorman as a Rural Town Center, and based on the Rural Preservation Strategy, land surrounding the Town Center should be designated as a Rural Town Area with, as stated above, **residential densities equal to or greater than the allowable densities in the current Area Plan**. However, our property is directly adjacent to the Rural Town Center of Gorman and instead of being designated as part of the Rural Town Area, it is being designated as part of a Rural Preserve Area, which is inconsistent with the Rural Preserve Strategy highlighted in the General Plan Update. The proposed change in land use for our property would not maintain densities equal to or greater than the current allowable densities, but rather would reduce the allowable density on our property by approximately 75%.

Additionally, under the General Plan Land Use Element, the County states that "an important component of sustainable land use is having a jobs/housing balance, which is a measure that is reached by working toward increasing opportunities for people to work and live in close proximity as to reduce long commutes that are costly both economically and environmentally". However, with regard to the town of Gorman, the County is proposing land uses that will hinder the ability to create a jobs/housing balance in the future. The County is promoting commercial development within the Gorman Town Center as well as additional commercial acreage at the intersection of I-5 and Highway 138 and further north along the I-5 between Highway 138 and the town of Gorman. While the County is promoting the future development of commercial along the I-5 and Highway 138 on neighboring parcels, they are simultaneously designating all additional surrounding properties as Rural Preserve, vastly limiting future residential development in the area and immediately creating the circumstance of a future jobs/housing imbalance in this important transit corridor.

We strongly object to the proposed land use designation changes from N-1 (non-urban hillside) to RL20 & RL40. Based on the information above, we request the proposed land use changes be more consistent with the current Antelope Valley Area wide Plan.

We look forward to working with the County on the Town & Country update and the appropriate Land Use Designation of the property.

Sincerely,  
MDM Gorman Post Ranch, LP



Mark Majer  
General Partner

- C. Ian Harvey/ MDM Gorman Post Ranch LP
- Bryan Avilla/ MDM Gorman Post Ranch LP
- Steve Hunter/ Land Design Consultants, Inc.



Three Points Liebre Mountain Town Council  
P O Box 617  
Lake Hughes, CA 93532  
3pointsliebremountain@gmail.com

13 September 2011

VIA EMAIL

Ms. Thuy Hua  
Senior Regional Planner  
Antelope Valley Area Plan Update  
Los Angeles County Regional Planning  
1320 West Temple Street Room 1354  
Los Angeles, CA 90012

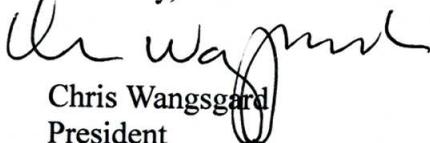
Dear Ms. Hua,

We are writing in response to the Notice of Preparation for the Antelope Valley Area Plan (AVAP). Since our rural town council area resides in the midst of the Angeles National Forest, the newly proposed San Andreas SEA, local agricultural lands, and open space of the Northwestern Antelope Valley, we feel the Environmental Impact Review document should include the effects of goals and policies that will guide, and ultimately, impact these rural and natural resource areas.

We see conflicts between the Conservation and Open Space policies outlining preservation of open space, habitats, scenic areas, and ecosystems, and those policies promoting renewable energy. Wind and solar energy require vast swaths of land, essentially, many thousands of acres. It would seem prudent to review the possible cumulative effects of a thirty year projected buildout of utility-scale renewable energy on large tracts of land currently designated as SEAs, areas of scenic importance, irreplaceable habitats and ecosystems, significant ridgelines, rural communities, and agriculture; where siting of projects is considered favorable and where the impacts are most destructive and least able, in our opinion, to be mitigated to less than significant level.

We know the California Environmental Quality Act requires that EIRs address impacts to local services, infrastructure, and affected communities. We would like to see the EIR explore those impacts related to "boom or bust" economies created by utility-scale renewable energy, promoted by the AVAP, that affect local rural businesses, schools, traffic, roads, air quality, water quality, fire control, and police protection.

Sincerely,

  
Chris Wangsgard  
President



Susan Zahnter  
Vice President



Karen Plemmons  
Secretary



Richard Zahnter  
Treasurer



Ian Coster  
Member-at Large

September 14, 2011

Los Angeles County  
Dept. of Regional Planning  
Attn.: Connie Chung and Thuy Hua  
320 W. Temple Street, Rm. 1356  
Los Angeles, CA 90012

E-mail: [genplan@planning.lacounty.gov](mailto:genplan@planning.lacounty.gov) and [tnc@planning.lacounty.gov](mailto:tnc@planning.lacounty.gov)

Subject: Comments on the NOP for the County of Los Angeles General Plan Update  
and Antelope Valley Area Plan Update

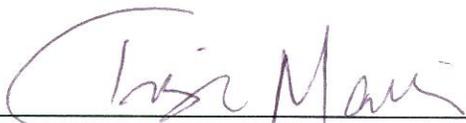
Dear Connie and Thuy:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,



Tricia Maier, Manager  
Program Administration Section

Attachment

County RMA Reference Number 11-022





**PUBLIC WORKS AGENCY  
TRANSPORTATION DEPARTMENT  
Traffic, Advance Planning & Permits Division**

**MEMORANDUM**

**DATE:** August 22, 2011

**TO:** RMA – Planning Division  
Attention: Laura Hocking

**FROM:** Behnam Emami, Engineering Manager II

**SUBJECT: REVIEW OF DOCUMENT 11-022** Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the **Los Angeles County General Plan and Antelope Valley Area Plan Update**  
Lead Agency: **Los Angeles County**

Pursuant to your request, the Public Works Agency -- Transportation Department has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Los Angeles County General Plan and Antelope Valley Area Plan Update.

The project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update and Antelope Valley Area Plan Update focus growth in the unincorporated areas with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas. The project will replace the adopted General Plan (excluding the Housing Element, adopted in 2008) and the adopted Antelope Valley Area Plan.

We offer a similar comment as in our Memorandum dated January 3, 2011:

When future developments are proposed, the projects may have site specific and/or cumulative adverse traffic impacts on County of Ventura roadways. The subsequent environmental documents under the Los Angeles County General Plan and Antelope Valley Area Plan Update should include any site-specific or cumulative impact to the County of Ventura local roads and the County of Ventura Regional Road Network.

Our review is limited to the impacts this project may have on the County of Ventura Regional Road Network.

Please contact me at 654-2087 if you have questions.



**VENTURA COUNTY WATERSHED PROTECTION DISTRICT**  
PLANNING AND REGULATORY DIVISION  
800 South Victoria Avenue, Ventura, California 93009  
Tom Wolfington, Permit Manager – (805) 654-2061

**M E M O R A N D U M**

DATE: September 12, 2011

TO: Laura Hocking, RMA/Planning Technician

FROM: Tom Wolfington, P.E., Permit Manager *TW*

SUBJECT: RMA 11-022 – Notice of Preparation of Draft EIR  
Los Angeles County General Plan and Antelope Valley Area Plan  
Updates

Pursuant to your request, this office has reviewed the subject Notice of Preparation.

**PROJECT LOCATION**

Los Angeles County is geographically one of the largest counties in the country with approximately 4,083 square miles. The County stretches along 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange County and San Bernardino County, to the north by Kern County, and to the west by Ventura County. The County also includes two offshore islands, Santa Catalina Island and San Clemente Island. The unincorporated areas account for approximately 65 percent of the total land area of the County. The unincorporated areas in the northern portion of the County are covered by large amounts of sparsely populated land and include the Angeles National Forest, part of the Los Padres National Forest, and the Mojave Desert. The unincorporated areas in the southern portion of the County consist of 58 noncontiguous land areas, which are often referred to as the County's unincorporated urban islands. The Antelope Valley Planning Area is located within Los Angeles County and bounded by Kern County to the north, Ventura County to the west, the Angeles National Forest (inclusive) to the south, and San Bernardino County to the east. It excludes the Cities of Lancaster and Palmdale. This area covers approximately 1,800 square miles and includes over two dozen communities.

**PROJECT DESCRIPTION**

The proposed project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs, and ordinances. The project covers the unincorporated area of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update and Antelope Valley Area Plan Update

focus growth in the unincorporated area with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas.

**WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:**

It is noted that the Notice of Preparation includes the following passages:

“Based on the County's preliminary analysis of the project, the following environmental issues will be examined in the Program EIR: (many are checked including Hydrology/Water Quality)

The Draft EIR will address the short- and long-term effects of the Los Angeles County General Plan Update and Antelope Valley Area Plan Update on the environment. Mitigation measures will be proposed for those impacts that are determined to be significant. A mitigation monitoring program will also be developed as required by Section 15150 of the CEQA Guidelines.”

The Ventura County Watershed Protection District (District) supports the examination of the environmental issues checked, including the addressing of long-term effects.

The District is particularly interested in the evaluation of all potential effects on Ventura County.

In previous reviews related to such planning activities as One Valley One Vision, the Santa Clarita Valley Area Plan Update, and Mission Village – Newhall Ranch, the District has expressed concerns related to discussion of regional solutions to eliminate increases in stream runoff at the Ventura / Los Angeles County line; the effects of fires and erosion; the hydrological and hydraulic impacts of flood peaks, flood stages, flood velocities, and erosion and sedimentation at all flood frequencies; the basis for use of bulking factors in connection with development changes; the use of latest available hydrology data; and the impact of further development on fluvial mechanics.

**END OF TEXT**



September 9, 2011

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 Temple Street Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Ms. Hua:

The Building Industry Association Los Angeles/Ventura Chapter (BIA) is hereby responding to the above stated Notice of Preparation. We are opposed to exclusively utilizing the proposed goals, policies, implementing programs and land use designations (density and intensity) the Draft Antelope Valley Area Plan: Town & Country (Draft Plan) as the basis for the draft Environmental Impact Report (EIR) study. The Draft Plan is currently under active review by the community, and has not yet been fully vetted for use in an EIR. Accordingly, we request that the EIR study include the range of land use designations associated with the current Land Use Plan and the Draft Plan.

Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, the BIA has a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The downzoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. This downzoning must result in an upzoning in other, less-affordable areas as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account

NOP EIR Scoping: AV Plan Response

Thuy Hua

September 9, 2011

Page 2

for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County will be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented. Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

Government agencies implementing SB 375 should not regard development, or the prohibitions of development, as the sole solutions for meeting their Greenhouse Gas (GHG) emission reduction target. Housing affordability, construction costs and other economic impacts must be considered when evaluating measures proposed for meeting the goals of SB 375.

As stated in the Notice,

“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of the BIA request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, we request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,



Marta Golding Brown

Antelope Valley Director

Los Angeles/Ventura Chapter



September 14, 2011

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

**Re: Initial Comments - Los Angeles County Draft General Plan Update 2035  
and Notice of Preparation of Draft Environmental Impact Report**

Dear Connie:

On behalf of the members and representative employees who make up the Building Industry Association of Southern California, Inc., Los Angeles Ventura Chapter (BIASC/LAV), thank you for the opportunity to comment on the proposed Draft General Plan (Plan) and the Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR).

Upon initial review of the Plan, we immediately note a very substantial shift in the type and location of future housing for the unincorporated Los Angeles County. We believe that the Plan should better reflect policies that will allow a range of housing options, including affordable housing, while adequately housing the growing population. A reasonable amount of that growth will, we believe, inevitably need to unfold in the north Los Angeles area. Hence, we recommend that the County carefully consider its density projections and especially the Housing Element to sufficiently assure that the housing needs for the future of Los Angeles County will be met.

In particular, major down-zoning is being proposed for north Los Angeles County. Additional information should be provided in the Plan to better explain what prospective changes are anticipated and where shifts in density are tentatively prescribed, both down-zoning of areas and up-zoning of other areas.

To help illuminate the true nature of the proposed changes, the Plan should provide maps and tables in an Appendix which indicate and locate current zoning densities, the proposed new densities, and the respective extents of up-zoning or down-zoning. This information should be made available early in the process to enable land owners and residents to understand the County's vision of the future as well as overall implications to individual parcels. Insertion of maps and tables will aid all land owners, residents and stakeholders in understanding the

proposed changes and the effect the changes could have on their land. The effort to preserve open space, farmland, biological resources, natural habitats, etc. should all be clearly identified on the maps to show current and proposed changes, and – in a separate map – the differences.

Table 2.5 of the Plan identifies a 147% increase in population in the Antelope Valley, a 99% increase in population in Santa Clarita Valley and an overall 39% population increase in Unincorporated Los Angeles County by 2035. Household projections are expected to increase by 148%, 95% and 43%, respectively. Where will this population live – and at what cost of construction? The down-zoning proposals in the Plan indicate less housing opportunities in unincorporated Los Angeles County. Where will affordable housing be located in unincorporated areas? Table C.2 in Appendix B provides the estimated population density that is 20% less than what is projected in Table 2.5. Further study of population should be provided to ensure adequate housing, affordable housing and employment opportunities are provided throughout the county.

With the proposed changes in future density and the drive to move people into more urban areas, it is also important to include maps and tables that highlight where the areas of up-zoning will occur as well as address how the up-zoning will impact traffic, aging and inadequate sized infrastructure for the increased population.

County planners should also be aware that major land use changes could have significant impact on future financing. As credit becomes more and more difficult to obtain, the major down-zoning and up-zoning throughout the county could make it significantly more complicated to obtain financing for construction and development when zoning and use designations are not in compliance with actual development. Standard loans could shift into non-conforming categories, making it more costly and difficult to obtain credit and complete real estate transactions.

The downzoning changes proposed reference a desire for the general plan to preserve environmentally sensitive and hazardous areas. More detailed analysis should be provided to highlight the current Significant Ecological Areas (SEA) to highlight how they are impacted under the current general plan vs. the Plan. Boundary maps should be shown to compare the current and proposed areas and the effects on land use. The same analysis on current general plan vs. Plan should be completed on the Very High Fire Hazard Severity Zone (FHSZ) Policy and map as it relates to justification for density reductions in rural unincorporated areas. Additional mapping should be completed to also highlight the difference between the Cal Fire FHSZ and that proposed by Los Angeles County. The last official Cal Fire FHSZ Map was approved by the State in 1995. Cal Fire is currently drafting a new FHSZ, which proposes significant changes and boundaries as well as new zones. Ideally, both maps should be in line, but in some circumstances they are not and will not be as the local agency has a better understanding of local land use and available infrastructure. However, given that these maps are used significantly for land development, insurance and financing, clear understanding of the boundaries and differences should be identified and referenced in the Plan and DEIR as appropriate.



September 14, 2011  
Ms. Connie Chung  
Page 3

Again the drastic density changes in the Plan cannot be adequately analyzed without also updating the Housing Element. The Plan is currently proposing to update nine of the 10 elements of the general plan. The Housing Element is not proposed at this time. It is our understanding that the Department of Regional Planning will update the Housing Element after Southern California Association of Governments (SCAG) releases the Regional Housing Needs Analysis (RHNA) numbers in October 2012 and that once the RHNA numbers are available and after completion of the EIR and General Plan Update, the County will begin working on the Housing Element. Since the current RHNA numbers are good until 2014, and given the significant impacts (traffic, infrastructure, housing costs, etc.) on increasing densities in urban areas, it is important to also update the Housing Element in conjunction with the General Plan Update. The Plan should identify how much is left to build to the 2014 plan. How many units have been built compared to the projections in RHNA, and the current general plan projections. The significant density shifts should be adequate and comply with RHNA.

The Plan identifies several Opportunity Areas where commercial development is encouraged to promote jobs. Figures 2.8 through Figures 2.18 identify several Opportunity Areas with promotion of Rural Town Centers. These same areas are where the major density reduction proposals are sought. An economic impact report of the Opportunity Areas should be completed to evaluate the density reduction proposals in the Plan. How will commercial and retail areas thrive without the needed residential to support the business economy? How will the County retain and attract business without the necessary rooftops to support the businesses? An in-depth economic impact analysis should help ensure that businesses can be supported and that job creation objectives can be met with the proposed reduced densities in rural Los Angeles County.

To supplement the economic impact analysis, a Fiscal Impact Analysis should also be completed that highlights current fiscal impacts as well as proposed. The analysis should focus on affordable housing and where affordable housing will be located. The proposed higher-density, multi-family development is extremely costly to build and therefore would need to be sold at a much higher prices than comparable single family homes. What will an average new home cost the average person to buy or rent? What are the projected incomes of the average resident of Los Angeles County?

The DEIR is slated to address both short and long term effects of the general plan alternatives. Therefore, an evaluation should also be completed to assess the current general plan, short and long term, to review the extent to which the current general plan is most beneficial to the region.

In addition to addressing density and the Housing Element, the Plan and DEIR should also be consistent with other related plans and the spirit of SB 375.

While preparing the Santa Clarita Area Plan, One Valley One Vision (OVOV), County planners worked directly with the City of Santa Clarita to ensure mutual goals and objectives were met. Has the same occurred with the City of Palmdale and Lancaster and local utilities? Do the local city general plans and zoning requirements, as well as existing and planned infrastructure accommodate the increased growth outlined in the Plan? Full analysis of the density proposals should be completed to accommodate for the future housing needs both in the unincorporated county area as well as the neighboring cities and communities that will accommodate the increased densities. This would include impacted areas in the entire Los Angeles basin including the communities in the Antelope Valley. Street and roadway plans, sewer plans, water procurement, etc. in all jurisdictions where up-zoning is proposed should reflect the proposals of the Plan.

How does the Plan provide consistency with SB 375? What CEQA streamlining measures will be available? Has enough analysis been completed to ensure there is no conflict with local area plans? Can the communities and neighborhoods accommodate the added densities proposed? Do impacted cities have adequate infrastructure to accommodate growth?

The Plan, in essence, seeks to eliminate lateral urban expansion, which – at its worst – is called sprawl. But the policies proposed would necessarily implicate a great many individual project proposals which are presently foreseeable and worthy of approval. Policy LU 1.5 – in particular – is a very concerning policy, as it purports to prohibit project-specific amendments and eliminate expanded capacity of the roadway network for future growth. BIASC/LAV suspects that such a provision would not pass legal muster, given that the Supervisors may not tie their own hands in such a manner. Apart from this, the policy would preclude new residential proposals which could in fact be directly adjacent to current approved parcel or tract maps that are yet to be built. Increased residential densities in these circumstances would not be urban sprawl, but traditional growth in a region. Road expansions and improvements in urban areas are always welcomed and almost always warranted for new residential or commercial developments and often aid in the reduction of congestion and improve existing conditions. County should look for all so-called “Smart Growth” opportunities and encourage wherever possible and avoid policies that make good development an expensive and complicated undertaking.

This additional analysis will enable us to better understand the need for the dramatic density reductions in the rural areas.

The 2035 General Plan and Area Plans should also provide much-needed flexibility. No one can predict the future and a means to address future changes should be provided without under-going needless hurdles by “Applicants”. We are concerned with Policy LU1.2 of the Plan, that “discourages project-specific amendments to the text of the General Plan...” and the Land Use



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Policies that could make needed General Plan Amendments complex, time-consuming and costly should they be deemed out of compliance with the Goals and Policies of the General Plan.

In the Plan and the Santa Clarita Valley Area Plan update (OVOV), the plan and zone lines correspond with the GIS-delineated parcel and roadway lines allowing for increased accuracy. However, there are instances in which this increased accuracy could have unintended consequences causing unnecessary administrative difficulties that could require plan amendments/zone changes. The Plan should provide flexibility in such instances so that amending these newly adopted plans would not be necessary. Both the existing general plan and the Santa Clarita Valley Area Plan provide provisions for plan line delineation that allow flexibility, which appears to have been eliminated from the updated plans.

Examples of why the Plan should provide flexibility follow, and would be useful for both applicants and the County when land use designation boundaries encroach into projects (for example; by 5 feet, 20 feet, 100 feet or more).

1. In the Plan and OVOV, there are instances where proposed land use designations follow a proposed highway alignment. However, upon final IEC approval, the roadway alignment may not match that of the proposed highway alignment indicated in the updated plans.
2. If a road is realigned for some reason (e.g., to save an oak tree) and the resulting bisected property has two land use designations, that may make the proposed project inconsistent with the newly adopted land use and zoning designations.
3. A future subdivision of land, or other proposed project, may cross two or more parcels (held under single ownership) with different land use designations. In the event that a project is proposed across two parcels with different land use designations that otherwise meet the criteria for each of the designations, the boundary of the land use designation should be able to be adjusted to follow final parcel lines without a plan amendment.
4. Lot line adjustments between parcels with different land use designations should have a mechanism to adjust the final land use designations without a plan amendment.

In the absence of such flexibility, the County would be complicating a variety of otherwise relatively straightforward development projects, including new projects, redevelopment projects, and Transit Oriented Development projects.

Solutions that would allow for flexibility or substantial conformance procedures that could allow the County, at an administrative level, to adjust boundaries without a formal plan amendment are presented below. BIASC/LAV respectfully urges that they be included in the DEIR among the alternatives and, preferably, with primacy therein.

1. Include similar language that is in the existing Santa Clarita Valley Area Plan.
2. Allow for a process similar to that of the City of Los Angeles' Zone Boundary Adjustment process.

*Individual Adjustments: The Director may, upon written request and after notice and hearing to the owners of the property affected by the proposed decision, make minor adjustments in the locations of zone boundaries to carry put the intent of this section when:*

1. Include a Substantial Conformance determination process similar to the process outlined in the adopted Newhall Ranch Specific Plan (section 5.2)

The solution may also be a combination of any of these measures.

Of final note, the NOP for the DEIR notes it will address potential ordinance updates, changes and additions. Some portions of the draft Plan also reference ordinance language (Quimby Act for example). An overview of current vs. proposed policy should be identified for ease in understanding what is new, what has been changed or modified and what remains the same within the ordinances and which ordinances, polices and manuals have been rescinded.

Sprawl has been identified as a key issue within the Plan. Sprawl apparently contributes to traffic congestion as there are no transit options, yet no TOD has been identified in the unincorporated north Los Angeles County area in the Draft General Plan TOD Policy Map. How will the County encourage infill and higher densities in these areas without TODs?

BIASC/LAV would also like to request the staff consider inclusion on analysis for future speculative developments. Our membership has been asked by Leading Agencies to incorporate analysis in the ir project EIRs for such projects including analysis of High Speed Rail (In Antelope Valley or the I-5 Corridor) and the effects on traffic reduction; the proposed Palmdale Regional Airport and potential effects on air space with increased densities; as well as the future High Dessert Corridor and impacts on the rural communities.

With the significant amount of work that has been presented in the draft Plan and Antelope Valley Area Plan, the BIA would like to request additional time to continue review of the plans and provide comment. We are currently meeting with Department of Regional Planning staff to



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Ms. Connie Chung  
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have detailed informational discussions on selected elements of the Draft General Plan. It would be appreciated if we could continue to meet with staff and provide further comment at a later date.

Given the substantial amount of evaluation and analysis that remains to be completed within the Draft General Plan, the BIA would like to request that the County complete and provide the additional studies and update the Draft for continued public review and comment.

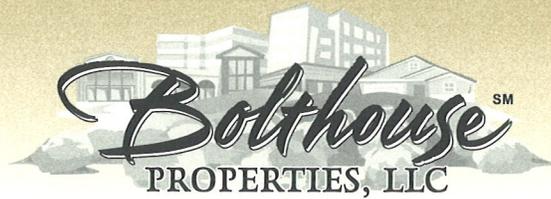
Thank you again for allowing the Building Industry Association of Southern California, Los Angeles/Ventura Chapter to provide initial comments. We look forward to working with you further on this extensive undertaking.

Sincerely,

*Holly Schroeder*

Holly Schroeder  
Chief Executive Officer

C: Mr. Richard Bruckner, Los Angeles County Director of Planning and Development  
Ms. Thuy Hua, Los Angeles County Dept. of Regional Planning Sr. Regional Planner  
Sandy Sanchez, BIASC/LAV Director of Government Affairs  
Marta Golding Brown, BIASC/LAV Antelope Valley Director



2000 Oak Street, Suite 250 • Bakersfield, CA 93301  
Ph: (661) 323-4005 • Fax: (661) 323-4006  
www.BolthouseProperties.com

September 13, 2011

THUY HUA, AICP  
Department of Regional Planning  
Community Studies North Section  
320 W. Temple Street  
Los Angeles, CA 90012

**Re: Notice of Preparation of a Draft Environmental  
Impact Report and Notice of Public Scoping  
Meetings**

Dear Ms. Hua:

Bolthouse Properties currently owns approximately 6,225 acres within the Antelope Valley Area Plan study area. Within this area approximately 4,244 acres currently lie within the unincorporated area of Los Angeles County, while approximately 1,981 acres lie within the cities of Lancaster and Palmdale. These properties, herein referred to as the "Study Area", are generally located in three separate regions, one being along E. Avenue K, one along E. Palmdale Blvd. at 165<sup>th</sup> Street East and one along E. Palmdale Blvd. at 240<sup>th</sup> Street East (please refer to **Exhibit 1 - Study Area**).

We have reviewed the Notice of Preparation for the Los Angeles County General Plan and the Antelope Valley Area Plan and would like to convey to the County of Los Angeles our existing and future interests for our landholdings. In particular, our continued interest in maintaining and preserving the agricultural use of our properties as well as protecting our interests for future utility scale renewable energy production.

**Existing and Proposed General Plan Land Use Designations**

In accordance with the 1986 Antelope Valley Area Plan, our land that lies within the unincorporated area of Los Angeles County is currently designated as Non-Urban 1 (N1). As you know, this land use designation limits development to one dwelling unit per two acres of land and is intended to: "preserve agricultural uses, limit density, promote clustered development and conserve open space and natural area."

Under this existing General Plan land use designation, Bolthouse Properties is currently involved in agricultural activities on all of these

parcels. The continued agricultural production of these parcels not only helps to maintain the existing rural character of the region, but also serves as a major economic and employment driver for the County.

With the introduction of the Preliminary Draft Antelope Valley Area Plan, our land within unincorporated Los Angeles County is proposed to be included under new General Plan land use designations. Approximately 4,203 acres are proposed to be included under the County's Rural Land 20 (RL-20) land use designation while one, approximately 40-acre parcel, is proposed to be included under the County's Rural Land 10 (RL-10) land use designation (please refer to **Exhibit 2 - Proposed General Plan Land Use**).

Both the proposed RL-20 and RL-10 land use designations would classify these parcels as part of the County's Rural Preserve. In accordance with the Preliminary Draft Antelope Valley Area Plan, development in this area is limited to single family homes at very low densities, and when appropriate, light and heavy agricultural uses, including equestrian and animal-keeping uses.

We agree with the County of Los Angeles in that the RL-10 and RL-20 land use designations are appropriate for our properties. We would like to express to the County our support in maintaining these land use designations to protect our existing and future agricultural interests.

### **Draft Renewable Energy Production Priority Map & Renewable Energy Ordinance**

It is our understanding the Draft Renewable Energy Production Priority map, which was publically introduced at a community meeting on June 18, 2011 has been retracted due to concerns raised by stakeholders. In place of the Draft Renewable Energy Production Priority Map, the County will be drafting a Renewable Energy Ordinance. This ordinance is anticipated to incorporate the information used in the development of the Draft Renewable Energy Production Priority Map, but it will also address more specific concerns, such as locational criteria, decommissioning, and development standards.

Bolthouse Properties currently has land under option to be developed as utility scale solar energy projects. This land, which consists of approximately 1,570 acres is outlined in red in **Exhibit 3 – Options for Utility Scale Solar Resources** and further described below:

THUY HUA, AICP  
Department of Regional Planning  
September 13, 2011  
Page 3 of 3

- 32 parcels totaling 320 acres located in the northeast corner of the City of Lancaster.
- One 160 acre parcel located southwest of the E. Palmdale Blvd. and 165<sup>th</sup> Street E intersection.
- Four parcels totaling 1,090 acres southeast of the E. Avenue P and E. Palmdale Blvd. intersection.

Bolthouse Properties has and continues to work diligently with the County, State, and utility companies to further pursue these solar options. In fact, the options that apply to the 320 and 1,090 acre areas have been under contract for over two years. As a considerable amount of time and capital has been invested in pursuing these solar options, we would like to request that the County of Los Angeles take these options into consideration when preparing the Renewable Energy Ordinance. By protecting the future development of utility scale solar power the County and Bolthouse Properties will mutually benefit by implementing the Energy goals and policies in the Draft Antelope Valley Area Plan and encouraging the development of a clean and renewable source of energy.

We appreciate the County's consideration to 1) protect the existing agricultural uses of our properties through the RL-20 and RL-10 General Plan land use designations, and 2) protect the existing and future options to develop utility scale solar resources. We look forward to working with the County of Los Angeles throughout the environmental review process.

Please do not hesitate to contact me should you have any questions or would like to further discuss.

Sincerely,



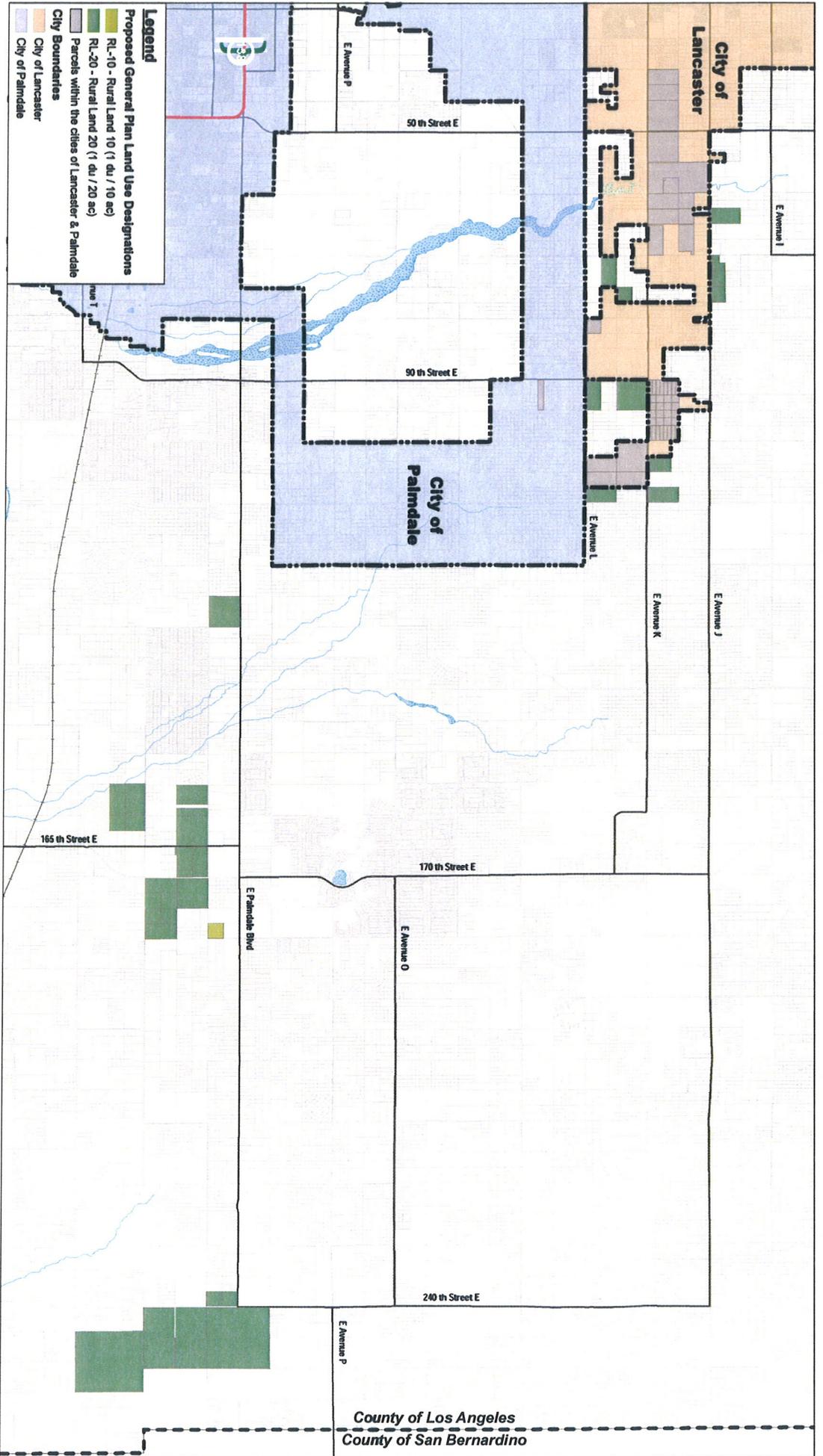
STEPHAN J. DeBRANCH  
Vice President of Development

SJD:jh  
CC: Alexa Washburn, Hogle-Ireland, Inc.  
Keith Carwana, Hogle-Ireland, Inc.

Attachments:

- 1) Exhibit 1 - Study Areas
- 2) Exhibit 2 - Proposed General Plan Land Use
- 3) Exhibit 3 - Options for Utility Scale Solar Resources





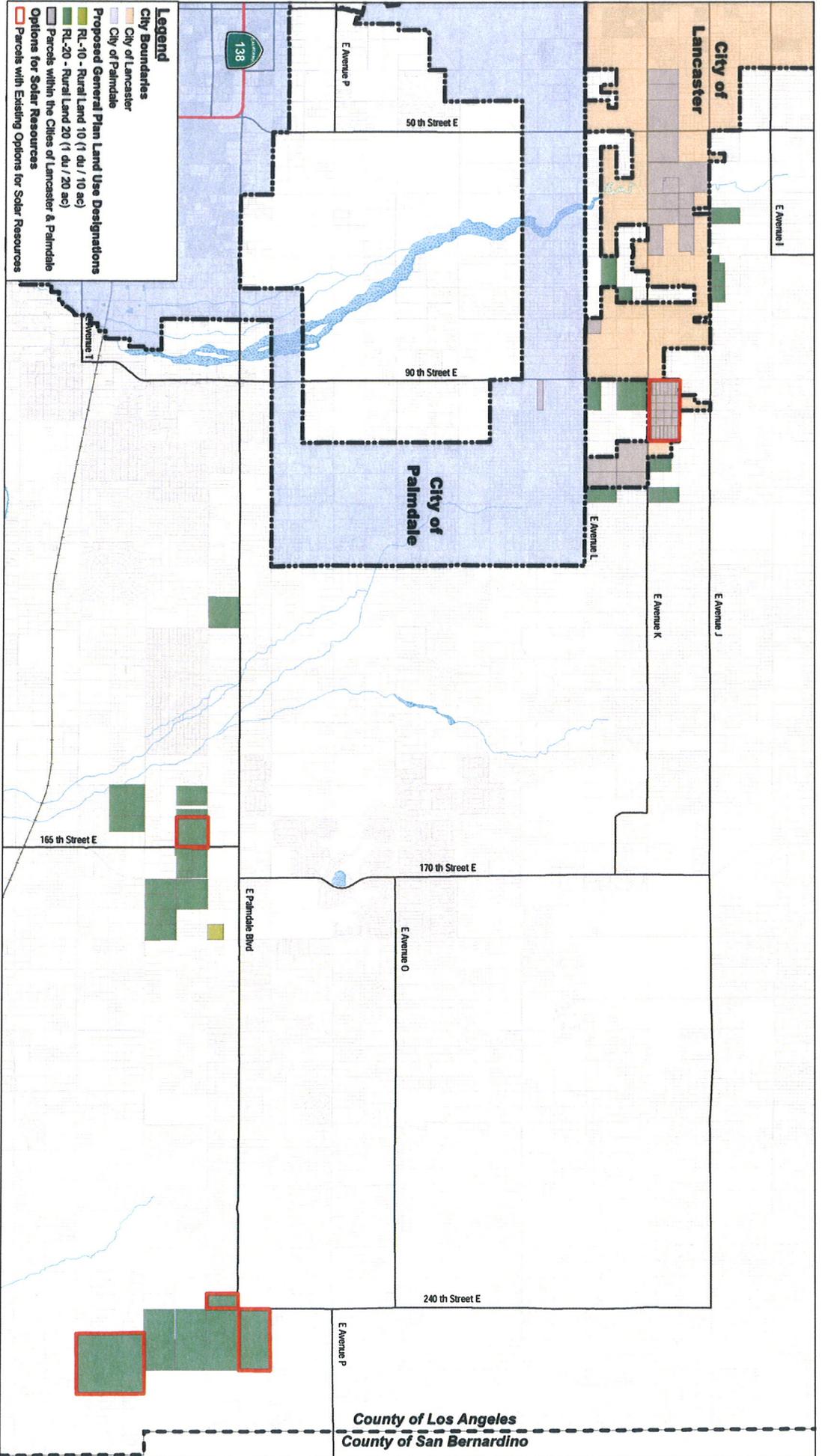
**Bolthouse Properties, LLC.**

**Exhibit 2 - Proposed General Plan Land Use**

Los Angeles County  
September 13, 2011

Not to Scale

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**Bolthouse Properties, LLC.**  
 Exhibit 3 - Options for Utility Scale Solar Resources  
 Los Angeles County  
 September 13, 2011

Not to Scale

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County of Los Angeles  
 County of San Bernardino



# California Regional Water Quality Control Board Lahontan Region



## Victorville Office

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Matthew Rodriguez  
Secretary for  
Environmental Protection

Edmund G. Brown Jr.  
Governor

September 14, 2011

File: Environmental Doc Review  
Los Angeles County

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

### **COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GENERAL PLAN UPDATE AND ANTELOPE VALLEY AREA PLAN UPDATE, LOS ANGELES COUNTY, STATE CLEARINGHOUSE NO. 2011081042**

The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the General Plan Update and Antelope Valley Area Plan Update being prepared by Los Angeles County (County). The General Plan and Area Plan will include goals, policies, implement programs and ordinances, accommodate growth, and reduce the potential for growth in environmentally sensitive and hazardous areas.

Pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096, responsible agencies must specify the scope and content of the environmental information germane to their statutory responsibilities. Water Board staff, acting on behalf of a responsible agency, is providing these comments to help guide in the development of General and Area Plan objectives that will maintain water quality and hydrologic function, and ultimately, protect the beneficial use of waters of the State. We hope the County will consider these comments and value our position with respect to protecting and maintaining beneficial uses and high quality waters within the Lahontan Region.

#### **AUTHORITY**

The State Water Resources Control Board (SWRCB) and the Water Board regulate discharges of waste in order to protect water quality and the beneficial uses of the waters of the State. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Water Board regulates the sources of water quality related problems, which could result in actual, or potential, impairment of beneficial uses or degradation of

water quality. All groundwater and surface waters are considered waters of the State. Surface waters include, but are not limited to, drainages, streams, washes, ponds, pools, or wetlands, and may be permanent or intermittent, either natural or manmade, and may or may not be identified as "blueline streams" on published topographic maps. All waters of the State are protected under California law. The Federal Clean Water Act (CWA) provides additional protection for waters of the U.S.

The Basin Plan provides guidance regarding water quality and how the Water Board may regulate activities that have the potential to affect water quality within the Region. The Basin Plan sets forth water quality standards for surface water and groundwaters of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan also identifies general types of water quality problems which can threaten beneficial uses and identifies required or recommended control measures for these problems. In some cases, it prohibits certain types of discharges in particular areas. The Basin Plan includes prohibitions and policies to achieve water quality objectives including maintaining high quality waters and beneficial uses. The Basin Plan includes a program of implementation to protect beneficial uses and to achieve water quality objectives.

The current Basin Plan was adopted by the Water Board in 1995 and has since been amended several times; the last amendment was adopted in May 2008. The Basin Plan can be accessed via the Water Board's web site at [http://www.waterboards.ca.gov/lahontan/water\\_issues/programs/basin\\_plan/references.shtml](http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml).

Implementation of the proposed Project must comply with all applicable water quality standards and prohibitions, including provisions of the Basin Plan.

## **PERMITTING**

Development within the County may require permits issued by either the SWRCB or Water Board because they have the potential to impact waters of the State. The required permits may include:

- Land disturbance of 1 acre or more may require a CWA, section 402(p) stormwater permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Stormwater Permit obtained from the SWRCB, or an individual stormwater permit obtained from the Water Board;
- Discharge of low threat wastes to a surface water, including diverted stream flows, construction and/or dredge spoils dewatering, and well construction and hydrostatic testing discharge, may require an NPDES permit for Limited Threat Discharges to Surface Waters issued by the Water Board;

- Discharge of low threat wastes to land, including clear water discharges, small dewatering projects, and inert wastes, may require General Waste Discharge Requirements (WDRs) for Discharges to Land with a Low Threat to Water Quality issued by the Water Board;
- Land disposal of waste<sup>1</sup>, including mining waste, is regulated under the California Code of Regulations (CCR), title 27, and may require Waste Discharge Requirements (WDRs) issued by the Water Board;
- Recycled water use is regulated under CCR, title 22, and may require Water Reclamation Requirements (WRRs) issued by the Water Board; and
- Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification (WQC) for impacts to federal waters (waters of the U.S.), or dredge and fill WDRs for impacts to non-federal waters, both issued by the Water Board.

Some waters of the State are "isolated" from waters of the U.S.; determinations of the jurisdictional extent of the waters of the U.S. are made by the United States Army Corps of Engineers. Projects that have the potential to impact surface waters will require the appropriate jurisdictional determinations. These determinations are necessary to discern if the proposed surface water impacts will be regulated under section 401 of the CWA or through dredge and fill WDRs issued by the Water Board.

We request that the DEIR list the permits that may be required, as outlined above, and identify the specific activities that may trigger these permitting actions in the appropriate sections of the environmental document. Information regarding these permits, including application forms, can be downloaded from our web site at <http://www.waterboards.ca.gov/lahontan/>. Also, please include information in the DEIR regarding the County's Storm Water Program and how it relates to individuals and businesses.

### **Effects of Urban Development on Water Quality**

The County's General and Area Plans are important to the Water Board because managing the water quality effects of urban development is a large part of our nonpoint source, stormwater, and water quality certification work. Most water quality impacts of urban development are best avoided by directing the location, pattern, and design of the development, rather than through traditional regulation of discharges. Many of the intractably degraded waters currently on the Water Boards' list of impaired water bodies are degraded by conditions most directly within the purview of local planning.

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<sup>1</sup> "Waste" is defined in the Basin Plan to include any waste or deleterious material including, but not limited to, waste earthen materials (such as soil, silt, sand, clay, rock, or other organic or mineral material) and any other waste as defined in the California Water Code, section 13050(d).

Watersheds are complex natural systems in which physical, chemical, and biologic components can interact to create a source of high quality water on which our economy and well-being depend. Poorly planned urban development can upset these natural interactions and degrades water quality through a web of interrelated effects. The primary impacts of poorly planned development projects on water quality can include:

- Direct Impacts – the direct physical impacts of filling and excavation on wetlands, riparian areas, and other waters;
- Pollutants – the generation of urban pollutants during and after construction;
- Hydrologic Modification – the alteration of flow regimes and groundwater recharge by impervious surfaces and stormwater collector systems;
- Watershed-level Effects – the disruption of watershed-level aquatic functions, including pollutant removal, floodwater retention, and habitat connectivity.

These impacts typically degrade water quality, increase peak flows and flooding, and destabilize stream channels; resulting in engineered solutions to the disrupted flow patterns and, ultimately, near-total loss of natural functions and values in the affected basins. Many examples of such degradation exist in California and elsewhere.

The Water Boards are mandated to prevent such degradation. CEQA establishes the process to provide the information we need to do so. Additional information is provided in the following attachments to this letter:

- Attachment 1, *Urban Development: Potential Water Quality Impacts and Required Analyses*. Outlines and diagrams the potential effects of land development on water quality and identifies related information needs.
- Attachment 2, *Low Impact Development References*. Lists documents providing guidance on principles and practices to avoid water quality and quantity problems associated with urban development.
- Attachment 3, *Terrestrial Habitat Connectivity Related To Wetland, Riparian, and Other Aquatic Resources*. Provides information and references on the importance of stream corridors, wetlands, and other waters in maintaining local and regional habitat connectivity.

### **Scope and Level of Needed Analyses**

The DEIR for the General and Area Plans should characterize the cumulative, direct, and indirect impacts to the quality of waters of the state caused by projects, which the General and Area Plans would authorize, and should identify alternatives and other mitigation measures to reduce and eliminate such impacts. Analyses should include:

#### **1. Beneficial Use Analyses**

A clear understanding of the location and nature of the waters potentially affected by this project is fundamental to fulfillment of our regulatory responsibilities. The DEIR

and General and Area Plans must include a planning area-scale map and general description based on available data of waters potentially affected by projects authorized by the General and Area Plans, tabulated and organized by watershed (drainage basin) and water body type, e.g., wetlands, riparian areas (as defined by the National Academy of Sciences)<sup>2</sup>, streams, other surface waters, and groundwater basins (a greater level of discrimination is usually appropriate, e.g., of wetland type). We request that the DEIR identify and list the beneficial uses of the identified surface water resources, as outlined in the Basin Plan, and evaluate the potential impacts to water quality with respect to those beneficial uses. The environmental document must include alternatives to avoid those impacts or list specific mitigation measures that, when implemented, minimize unavoidable impacts to a less than significant level.

## 2. Avoidance and Minimization Analysis

There are many ways projects that may be developed under the General and Area Plans can degrade water quality, and this complicates analysis. Fortunately, avoiding or minimizing any step in a pollution pathway will eliminate or reduce subsequent effects, and will simplify the associated needed analyses; and a small number of key variables control most of the pathways causing water quality degradation. We strongly encourage avoidance as the primary strategy to address water quality concerns.

Please include in the DEIR measures to avoid or minimize each potential cause of water quality degradation as described in Attachments 1 and 3 to these comments.

## 3. Alternatives Analysis

Because development projects can individually and cumulatively cause major water quality impacts, we strongly encourage a low-impact planning approach (low-impact development [LID]). Such an approach generally involves more compact development that minimizes generation of urban pollutants; preserves the amenity and other values of natural waters; maintains natural waters, drainage paths, landscape features and other water-holding areas to promote stormwater retention, pollution removal, and groundwater recharge; designs communities and landscaping to minimize stormwater generation, runoff, and concentration, promotes groundwater recharge, and reduces water demand; and promotes water conservation and re-use.

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<sup>2</sup> "Riparian areas are transitional between terrestrial and aquatic ecosystems and are distinguished by gradients in biophysical conditions, ecological process, and biota. They are areas through which surface and subsurface hydrology connect water bodies with their adjacent uplands. They include those portions of terrestrial ecosystems that significantly influence exchanges of energy and matter with aquatic ecosystems (i.e., a zone of influence). Riparian areas are adjacent to perennial, intermittent, and ephemeral streams, lakes, and estuarine-marine shorelines" (National Research Council. *Riparian Areas, Functions and Strategies for Management*. National Academy of Sciences, Washington, D.C. 2002). Riparian areas are created and maintained by periodic inundation by overbank flood flows from the adjacent surface water bodies.

Please include in the DEIR a low-impact approach for future authorized projects. Principles and practices of LID are described in the documents listed in Attachment 2, Low Impact Development References, to these comments.

#### 4. Characterization of Impacts

As noted above, we believe avoidance is the best strategy for managing potential water quality impacts. For unavoidable impacts, understanding how pollution pathways will operate is essential to managing them. Please include in the DEIR:

- a. Specify at a watershed-level of detail the causes, natures, and magnitude of impacts, which would result from projects, authorized under the General and Area Plans, referring to Attachments 1 and 3 to these comments.
- b. Quantify impacts as definitively as feasible, using appropriate modeling and adequate data. Modeling approaches should be documented, and data deficiencies or other factors affecting the reliability of the results identified and characterized.
- c. Identify whether impacts will be temporary or permanent.

#### 5. Hydrologic Analysis

Because increased runoff from developed areas is the key variable driving a number of other adverse effects, attention to maintaining the pre-development hydrograph will prevent or minimize many problems and will limit the need for other analyses and mitigation in the General and Area Plans DEIR and in subsequent project-specific EIRs. Such effects are difficult to manage at a project-specific level, and are most effectively addressed at the General Plan level.

Please include the following in the DEIR: -

- a. Alternatives and mitigation measures to maintain the pre-existing hydrology.
- b. A meaningful analysis of potential cumulative impacts to watershed hydrology from existing and planned development in the watershed or planning area.

#### 6. Habitat Connectivity Analysis

Riparian corridors and other waters within the regulatory purview of the Water Boards play an important role in maintaining habitat connectivity. Both aquatic and terrestrial habitat may be fragmented by impacts to streams, riparian areas, or other waters.

Each project should:

- a. Analyze the regional importance of movement corridors in and along water bodies, the potential effect of disrupting such corridors, and the potential for enhancing such corridors through mitigation measures.
- b. Include information regarding any sensitive plant and animal species that likely utilize the corridors.

- c. Identify any impacts to riparian or other waters that could compromise future remediation of existing connectivity barriers.
- d. To inform these analyses, consider the information and literature referenced in Attachment 3, *Terrestrial Habitat Connectivity Related To Wetland, Riparian, and Other Aquatic Resources*, including recent data on the role of riparian corridors as movement corridors in California.

### **Low Impact Development Strategies and Storm Water Control**

The foremost method of reducing impacts to surface waters and groundwater from development is "Low Impact Development" (LID), the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of nonpoint source pollutants. LID results in less surface runoff and potentially less impacts to receiving waters, the principles of which include:

- Maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge;
- Reducing the impervious cover created by development and the associated transportation network; and
- Managing runoff as close to the source as possible.

We understand that LID development practices that would maintain aquatic values could also reduce local infrastructure requirements and maintenance costs, and could benefit air quality, open space, and habitat. Vegetated areas for stormwater management and infiltration on-site are valuable in LID, and may enhance the aesthetics of the property. These principles can be incorporated into the proposed project design. We request natural drainage patterns be maintained to the extent feasible. Minimum-disturbance activities (such as preservation of vegetation and grade) are preferable to more structural (hard scape) control measures because they protect and preserve the natural drainage system. Natural drainage, including the use of vegetated buffer zones and rock swales, is the most effective means of filtering sediment and pollution and regulating the volume of runoff from land surfaces to adjacent streams, including washes.

LID practices may be more cost effective than revegetation practices or structural controls, especially long-term. Cost savings can be realized through reduced maintenance cost for stormwater infrastructure and repairs. Efforts should be made to avoid drainage channels, or to develop broad crossings if necessary, to minimize any unavoidable impacts.

Best Management Practices must be used to mitigate project impacts throughout the County. Best management practices for post-storm events need to be incorporated and monitored throughout the County to minimize erosion, deposition of sediment, and the accompanying possible degradation of water quality, increased maintenance, and property damage.

Future development should be designed to ensure that runoff is not concentrated by the proposed project, thereby preventing downstream erosion. In addition, the County could consider the establishment of mitigation areas near drainages, canyons, and river zones. Terraces and other methods of minimizing hillside disturbance for development could be incorporated with buffer zones to reduce erosion.

Projects to be developed should also indicate the final configuration of the "blue-line" streams, if applicable, and other drainages in the project vicinity. Project proponents should draw maps using an overlay feature to indicate where building pads, etc., will be placed in relation to drainages existing on the property. Each project will need to quantify these impacts, and discuss the purpose of the project, need for surface water disturbance, and alternatives (avoidance, minimize disturbances and mitigation) in their environmental document. Mitigation must be identified in the environmental document including timing of construction such that construction be limited to seasons less likely to have precipitation events.

### **Wastewater**

We also recommend that high density and/or large developments proposing to use septic tanks/leach fields be required to analyze the use of alternative wastewater treatment and disposal methods, and to conduct studies to determine the feasibility of connecting to the nearest sanitary sewer system. We suggest that community plans include unincorporated areas in order to address extension of sanitary sewer.

### **Specific Comment**

Attached to the Notice of Preparation is a Discussion of Environmental Factors for the 10<sup>th</sup> Street West Transmission Main Phase III. It is unclear how this checklist relates to the Notice of Preparation for the DEIR for the General and Area Plans. Please provide clarification as to how the checklist for the 10<sup>th</sup> Street West Transmission Main Phase III is connected to the General and Area Plans, and provide additional details in the project description referencing the activities discussed in this checklist, as well as a map showing the location of the 10<sup>th</sup> Street West Transmission Main Phase III. Please be aware that projects conducted in phases must be evaluated for environmental impacts based on the whole of the project, not just an individual phase.

### **CLOSING**

We look forward to working with you in a manner that protects water quality. If you should have any questions regarding our above or attached comments, please contact me at (760) 241-7305 ([bbergen@waterboards.ca.gov](mailto:bbergen@waterboards.ca.gov)) or Patrice Copeland, Senior Engineering Geologist, at (760) 241-7404 ([pcopeland@waterboards.ca.gov](mailto:pcopeland@waterboards.ca.gov)). The Water Board recommends that future project applicants and/or lead agencies consult with Board staff to discuss potential project impacts, including avoidance and mitigation measures. Early consultation with the Water Board is recommended, since modification of proposed projects within the County may be required to avoid or reduce impacts to hydrology and water quality.

Sincerely,



Brianna Bergen, PG  
Engineering Geologist

Attachments:

*Attachment 1, Urban Development: Potential Water Quality Impacts and Required Analyses*

*Attachment 2, Low Impact Development References*

*Attachment 3, Terrestrial Habitat Connectivity Related To Wetland, Riparian, and Other Aquatic Resources*

cc: State Clearinghouse (SCH No. 2011081042  
Thuy Hua, AICP, Los Angeles County Department of Regional Planning,  
(via email, [tnc@planning.lacounty.gov](mailto:tnc@planning.lacounty.gov))

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## Urban Development: Potential Water Quality Impacts and Required Analyses

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### INTRODUCTION

This Attachment consists of a table and a diagram showing how urban development can affect water quality, and the information needed to predict and manage the impacts. Pollution pathways are described and diagrammed at the level of detail at which potential effects can be analyzed and management measures applied. The table and diagram are described (and in electronic version hyperlinked) below.

Watersheds are complex natural systems in which physical, chemical, and biologic components interact to create and maintain the beneficial uses of water on which society's well-being and economy depend. Similarly, disturbances to natural watershed dynamics caused by urban development degrade water quality through a complex of interrelated causes and effects. Unmanaged, these pollution pathways ultimately destroy the physical, chemical, and biological integrity of the watersheds in which they occur, diminishing or destroying the beneficial uses.

The table and diagram are:

**Table 1**, Potential Effects Of Urban Development On Beneficial Uses and Required Analyses outlines the causes of water quality degradation caused by urban development, provides literature citations for each of the effects, and identifies for each effect the project-specific information needed to assess and mitigate its adverse impact to water quality.

**Figure 1**, Potential Effects Of Urban Development On Beneficial Uses flowcharts the causes and effects listed in Table 1. It begins on the left with three activities which are associated with urbanization: filling, construction (active construction and post-construction phases), and channelization. Figure 1 ends on the right with the resulting impaired beneficial uses and the potential for increased maintenance and property damage. In between are intermediate processes. Cause-and-effect relationships are shown by arrows.

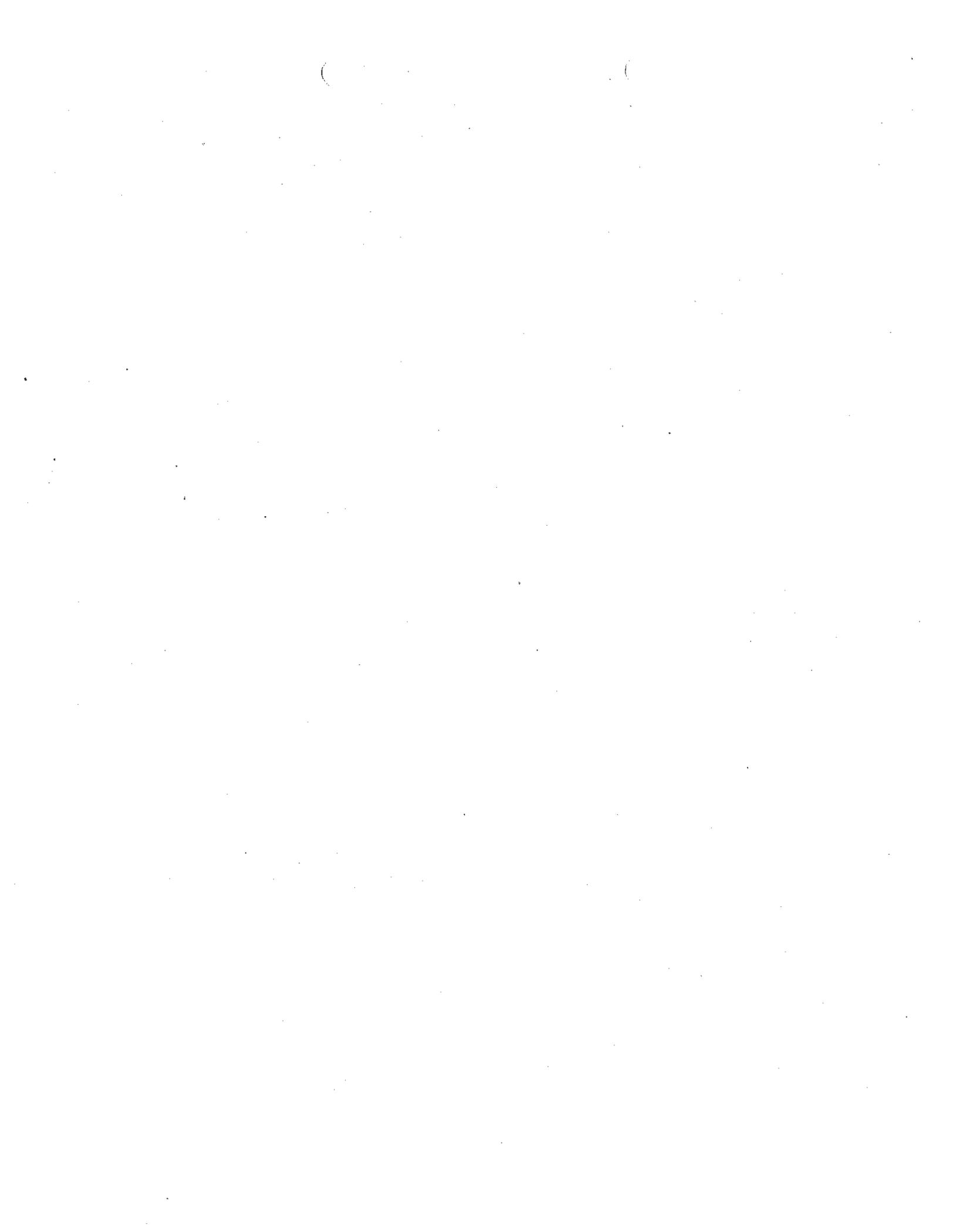


TABLE 1

**Potential Effects of Urban Development on Beneficial Uses  
 and Required Analyses**

Urban development degrades water quality through a complex of interrelated causes and effects.

**How to Use this Table.** Table 1 outlines the pollution pathways potentially associated with urban development, provides literature citations for each cause-and-effect relationship, and identifies the information needed to assess and manage potential effects on a project-specific basis. The pollution pathways are described at the level of detail at which project-specific potential effects can be analyzed and management measures applied. The same analysis can also be applied more broadly at a general level, e.g., to urban development that would be authorized under a land-use general plan. This Table is comprised of three worksheet sub-tables described below. (In the electronic version of this table, the sub-tables are accessed via tabs at the bottom of the page).

The "**Potential Water Quality Impacts and Required Analyses**" worksheet displays the potential causes and effects (in the "Cause" and "Effect" columns respectively) of water quality degradation associated with urban development, and the information needed to assess and manage project-specific effects (the "Needed Analysis" column). Because of the complex nature of watershed dynamics, many "effects" are also "causes" along the pollution pathways, and the number in square brackets listed with each "effect" cross-reference to its enumerated place in the "Cause" column. Additionally, each of the "effects" is footnoted, and the footnote number refers to the associated note in the "Notes" sub-table.

A **Related Flow-Chart Diagram** (Figure 1, "Potential Effects of Urban Development on Beneficial Uses") graphically displays these cause-and-effect relationships.

The "**Notes**" worksheet displays the summary literature citations for each of the "effects" in the "Potential Water Quality Impacts..." sub-table, keyed to the numeric footnotes in the "Effects" column.

The "**References**" worksheet displays the full literature citations, indexed by author.

CAUSE	EFFECT	NEEDED ANALYSES
<b>1. FILL &amp; EXCAVATION</b> Fill or excavation in wetlands, riparian areas, or other waters of the state.	<b>A. Decreased Flood Storage. [4]</b> Fill can impinge on the natural storage volume of ephemeral, intermittent, and perennial channels, backwaters, and wetlands, reducing capacity to retain runoff. <sup>1</sup>	1) Quantify reduced flood storage in each affected basin. 2) Identify mitigation.
	<b>B. Change in Groundwater Storage. [10]</b> Fill and excavation can decrease groundwater recharge and cause lower water tables by changing soil percolation characteristics and reducing the area of standing water in recharge basins. <sup>2</sup> Linear excavation (e.g., for utility lines) can act as a conduit to drain groundwater and locally lower water tables.	1) Quantify groundwater response to changes in percolation. 2) Identify locations where linear alignments could act to dewater shallow aquifers. 3) Identify mitigation.

CAUSE	EFFECT	NEEDED ANALYSES
<b>2A. CONSTRUCTION</b> Clearing, grading, and construction of structures and facilities.	<b>C. Change in Wetland and Riparian Vegetation. [17]</b> Fill and excavation can bury or remove vegetation and can change site features to prevent reestablishment of characteristic species.	1) Identify and map types and areal extents of affected vegetation. 2) Identify mitigation.
	<b>D. Impaired Beneficial Uses. [18]</b> Fill can directly impair beneficial uses by reducing water area and changing hydrology, geomorphology, substrate, and other waterbody characteristics. In addition, projects which fragment habitat and reduce wildlife movement along riparian and other corridors can degrade remaining patches of wetlands and other habitat by changing their physical characteristics and by isolating and exposing small populations of plants and animals, resulting in local or regional extinctions. <sup>3</sup>	1) Document types, areal extents, and (for drainage features) lengths of affected waters. 2) Characterize and map at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity. 3) Identify effects of fill on terrestrial and aquatic habitat connectivity (refer to Enclosure 3). 4) Identify watershed-level effects on pollutant removal and flood retention. 5) Identify mitigation.
	<b>A. Production of Urban Pollutants. [7]</b> Construction can produce pollutants through improper use and disposal of toxic construction materials.	1) Identify mitigation for inclusion in stormwater pollution prevention plan.
<b>B. Change in Soil Erosion. [8]</b> Active construction can dramatically increase soil erosion by exposing and destabilizing soils. Erosion is compounded by the increased runoff typically accompanying construction. <sup>6</sup>	1) Identify location and extent of planned grading. Display proximity and slope relationships to receiving drainages. 2) Document erodibility of soils and subsoils in areas proposed for grading. 3) Quantify amount and duration of increased sediment loadings to each affected drainage. 4) Identify mitigation.	
<b>C. Increased Runoff. [9]</b> Construction can increase both the total and peak volume of stormwater runoff by removing vegetation, compacting soil, exposing dense subsoil, creating steep graded slopes, and eliminating terrain depressions and ephemeral and intermittent drainages that would naturally slow the movement of stormwater. <sup>9</sup>	1) Quantify total and peak volumes of increased runoff for each affected drainage 2) Identify mitigation.	

CAUSE	EFFECT	NEEDED ANALYSES
<b>2B. POST-CONSTRUCTION</b> Ongoing effects of constructed environment.	<b>D. Impaired Beneficial Uses. [18]</b> Projects which fragment habitat and reduce wildlife movement along riparian and other corridors can degrade remaining patches of wetlands and other habitat by changing their physical characteristics and by isolating and exposing small populations of plants and animals, resulting in local or regional extinctions. <sup>11</sup>	1) Characterize and map at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity. 2) Identify effects of construction on terrestrial and aquatic habitat connectivity (refer to Enclosure 3). 3) Identify mitigation.
	<b>A. Dry weather discharge. [6]</b> Construction can cause dry-season "nuisance" runoff from activities such as landscape irrigation <sup>5</sup> , sidewalk and vehicle washing, and basement dewatering.	1) Characterize volumes, seasonality, and other pertinent characteristics of "nuisance" flows for each affected drainage.
	<b>B. Increased Groundwater Pumping. [5]</b> Construction can cause increased groundwater pumping for domestic or landscape use. <sup>4</sup>	1) Quantify and map locations of increased pumping.
	<b>C. Production of Urban Pollutants. [7]</b> After construction, urban areas can generate pesticides, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, bacteria, viruses, and other pollutants from activities such as landscape care and vehicle operation and maintenance. <sup>7</sup>	1) Quantify projected increase in pollution production in each affected basin. 2) Identify mitigation.
	<b>D. Change in Soil Erosion. [8]</b> After construction, erosion can be reduced to below natural levels because soils are covered with buildings and pavement, and runoff is routed through storm drains. <sup>8</sup>	1) Quantify reduction of natural sediment delivery rates to each affected basin. 2) Identify mitigation.
<b>E. Increased Runoff. [9]</b> After construction, maintained landscapes and impervious surfaces such as roofs and streets increase total and peak runoff. The increased flows move quickly over paved surfaces and are collected, concentrated, and further accelerated in stormdrain systems. The combination of increased flows and more efficient transport causes a higher, "flashy", more rapidly peaking and falling hydrograph, especially for smaller, more frequent floods. <sup>10</sup>	1) Quantify project-induced changes in total and peak runoff rates to each affected drainage. 2) Identify mitigation.	

CAUSE	EFFECT	NEEDED ANALYSES
<p><b>3. CHANNELIZATION</b>                      Engineered changes in channel structure or morphology to stabilize banks, prevent flooding, or increase flow conveyance.</p>	<p><b>A. Decreased Flood Storage. [4]</b>                      Channelization can reduce flood storage within a basin by restricting flows to the active channel, thereby preventing detention of floodwater in backwaters and on the adjacent floodplain.<sup>12</sup></p>	<p>1) Quantify and map reductions in flood storage in each affected basin.                      2) Identify mitigation.</p>
	<p><b>B. Change in Groundwater Storage. [10]</b>                      Lining channel bottoms can change groundwater storage by reducing percolation and groundwater recharge.<sup>13</sup> Deepening natural channels can drain adjacent shallow water tables.<sup>14</sup></p>	<p>1) Quantify and map locations of reduction in recharge rates.                      2) Quantify effects on channelization on shallow water tables and associated wetlands.                      3) Identify mitigation.</p>
	<p><b>C. Channel Destabilization. [11]</b>                      Channelization can cause channel destabilization by changing the balance between the stream's flow, sediment load, and channel form. Destabilization tends to affect entire stream systems. For example, channelization can concentrate and synchronize peak flows from tributary streams, causing increased channel erosion both above and below the channelized reach. The eroded sediment is then deposited downstream when the flow slows down, where it may initiate further destabilization.<sup>15</sup></p>	<p>1) Quantify basin-level hydrologic and fluvial geomorphic effects of channelization in each affected drainage.                      2) Identify mitigation.</p>
	<p><b>D. Increased Flooding Frequency. [14]</b>                      Constricted channels (e.g., in leveed sections) can cause water to back up, resulting in localized upstream flooding. Rapid passage of floodwaters through "improved" channels can increase flooding downstream by concentrating and synchronizing tributary peaks.<sup>16</sup></p>	<p>1) Quantify basin-level hydrologic effect of channelization on each affected basin, including changes in flood return frequencies.                      2) Identify mitigation.</p>
	<p><b>E. Decreased Pollutant Removal. [16]</b>                      Channelization can decrease natural pollutant removal by reducing instream structural complexity and turbulent-flow aeration, increasing flow velocity, reducing overbank flow, and by causing change in vegetation.<sup>17</sup></p>	<p>1) Map waters lost to channelization in each affected drainage and characterize type, areal extent, and pollutant removal value.                      2) Quantify affect on pollutant loadings to each affected waterbody and downstream receiving waters.                      3) Identify mitigation.</p>

CAUSE	EFFECT	NEEDED ANALYSES
	<p><b>F. Change in Wetland and Riparian Vegetation. [17]</b>                      Channelization and associated maintenance can directly destroy wetland and riparian vegetation and can change site features to prevent reestablishment of characteristic species.<sup>18</sup></p>	<p>1) Map and Identify types and areas of affected vegetation.                      2) Identify mitigation.</p>
	<p><b>G. Impaired Beneficial Uses. [18]</b>                      Channelization and associated maintenance can directly impair beneficial uses by reducing waterbody area; increasing stream velocity; disrupting riffle and pool sequences, cover, and other structural features; changing substrate; cutting off nutrient inputs to and from backwaters and riparian wetlands, dewatering upstream reaches, and reducing aesthetic and recreational value. Reduced overbank flooding can adversely affect reproduction of riparian vegetation and wetland and riparian functions.<sup>19</sup>                      Channelization can inhibit the movement of fish, other aquatic biota, and wildlife, and thus isolate and reduce the viability of populations up and downstream.<sup>20</sup> Construction of channels can introduce sediment, nutrients, and toxics into the water column.<sup>21</sup></p>	<p>1) Identify direct and indirect effects of proposed channelization projects on beneficial uses.                      2) Characterize and display at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity.                      3) Identify effects of channelization on terrestrial and aquatic habitat connectivity.                      4) Identify mitigation.</p>
<p><b>4. DECREASED FLOOD STORAGE</b></p>	<p><b>A. Increased Runoff. [9]</b>                      Reduced flood storage on the floodplain and in channels, swales, wetlands, backwaters, and other natural depressions increases and accelerates runoff.<sup>22</sup></p>	<p>1) Quantify total and peak volumes of increase runoff for each affected drainage.                      2) Identify mitigation.</p>
<p><b>5. INCREASED GROUNDWATER PUMPING</b></p>	<p><b>A. Change in Groundwater Storage. [10]</b>                      Increased groundwater pumping can lower watertables locally or in distant donor basins.<sup>23</sup></p>	<p>1) Quantify and map locations of project-induced changes in groundwater levels.                      2) Identify mitigation.</p>
<p><b>6. DRY WEATHER DISCHARGE</b></p>	<p><b>A. Change in Baseflow. [12]</b>                      Dry weather runoff from urban activities can increase dry-period streamflows.<sup>24</sup></p>	<p>1) Quantify hydrologic effects of dry weather flows on the baseflow of each affected drainage.</p>

CAUSE	EFFECT	NEEDED ANALYSES
7. PRODUCTION OF URBAN POLLUTANTS	<p><b>B. Increased Pollutant Delivery. [13]</b>                      Dry weather runoff can carry the pollutants generated by the activity causing the flow, e.g., pesticides, nutrients, and petrochemicals from landscape maintenance and cleaning sidewalks and vehicles. Collection of polluted dry weather flows in catch basins may result in shock loadings when it is displaced by subsequent storm flows.<sup>25</sup></p>	<p>1) Quantify and characterize pollutant loadings from activities generating dry weather runoff to each affected drainage.                      2) Identify mitigation.</p>
	<p><b>A. Increased Pollutant Delivery. [13]</b>                      Increased production of urban pollutants can cause increased delivery of pollutants to surface and groundwater.<sup>26</sup></p>	<p>1) Quantify and characterize pollutant loadings from to each affected drainage.                      2) Identify mitigation.</p>
8. CHANGE IN SOIL EROSION	<p><b>A. Channel Destabilization. [11]</b>                      Changes in upland soil erosion can destabilize stream channels by changing the amount of sediment carried into the stream. The stream may then erode or aggrade its channel to balance its available energy with the changes in its sediment load.</p> <p>1. Increased sediment from construction causes channel aggradation, changing stream cross sections and redirecting flows.<sup>27</sup></p> <p>2. Decreased sediment from a paved watershed can cause channel incision and/or side-cutting. The effect may be compounded by increased runoff from the paved watershed. Aggradation may occur downstream where the flow slows and deposits the eroded sediment, which may deflect flows against the channel banks and cause further bank erosion.<sup>28</sup></p>	<p>1) Conduct geomorphologic analysis of channel response to increases in construction-related sediment.                      2) Conduct geomorphologic analysis of channel response to long-term reductions in sediment delivery to each affected drainage.                      3) Identify mitigation.  <u>Note:</u> Sediment as a pollutant is considered in No. 7, "Production of Urban Pollutants".</p>
9. INCREASED RUNOFF	<p><b>A. Change in Soil Erosion. [8]</b>                      Increased runoff can dramatically increase soil erosion by causing greater runoff velocities which more effectively displace and carry soil particles. Construction-related soil destabilization can compound the effect.<sup>29</sup></p> <p><b>B. Change in Groundwater Storage. [4]</b>                      Increased runoff can reduce groundwater recharge and lower water tables, since water draining from impervious surface is unable to percolate to groundwater at that location.<sup>30</sup></p>	<p>1) Quantify increases in sheet and gully erosion resulting from increased runoff.                      2) Identify mitigation.</p> <p>1) Map locations of and quantify losses of recharge and water table response.                      2) Identify mitigation.</p>

CAUSE	EFFECT	NEEDED ANALYSES
	<p><b>C. Channel Destabilization. [11]</b>                      Increased peak runoff can destabilize channels by increasing the flow velocity and erosive power of the stream. Head cutting, incision and/or widening of the channel, and associated sideslope failures can result. Reduced sediment input as a result of change in soil erosion rates can compound the effect.<sup>31</sup> In small streams, increased runoff may also dislodge logs and other channel features that help to define the channel.<sup>32</sup></p>	<p>1) Quantify channel geomorphic response to increased runoff for each affected drainage.                      2) Identify mitigation.</p>
	<p><b>D. Increased Pollutant Delivery. [13]</b>                      Increased runoff increases pollutant delivery because it can more effectively carry particulate and soluble pollutants to receiving waters. Increased flow velocity reduces contact time with soil and vegetation that might otherwise remove pollutants.<sup>33</sup></p>	<p>1) Quantify types and quantities of increased pollutant loadings to each affected drainage.                      2) Identify mitigation.</p>
	<p><b>E. Increased Flooding Frequency. [14]</b>                      Increased runoff and greater transport efficiency result in higher peak flows from storms of a given return period.<sup>34</sup></p>	<p>1) Quantify basin level hydrologic effect of increased runoff on each affected basin, including changes in flood return frequencies.                      2) Identify mitigation.</p>
	<p><b>F. Change in Water Temperature. [15]</b>                      Increased runoff from urban areas can raise the temperature of receiving waters because runoff from impervious surfaces is often warmer than runoff from pervious surfaces or subsurface flow.<sup>35</sup></p>	<p>1) Model increase in water temperature along stream profile of each affected drainage.                      2) Identify mitigation.</p>
	<p><b>G. Impaired Beneficial Uses. [18]</b>                      Increased runoff can impair habitat values by flushing fish and invertebrates out of streams,<sup>36</sup> increasing water level fluctuations and the velocity of flows entering wetlands,<sup>37</sup> and causing salinity changes in estuaries and other nearshore marine waters.<sup>38</sup></p>	<p>1) Identify direct effects of increased flow on aquatic biota, hydrologic regimes of adjacent wetlands, and salinity of marine receiving waters for each affected drainage.                      2) Identify mitigation.</p>
<p><b>10. CHANGE IN                      GROUNDWATER                      STORAGE</b></p>	<p><b>A. Change in Baseflow. [12]</b>                      Changes in watertable level can cause changes in the dry weather baseflow of streams fed by groundwater.<sup>39</sup></p>	<p>1) Quantify for each affected drainage the changes in baseflow associated with lowered water tables and map locations.                      2) Identify mitigation.</p>
	<p><b>B. Change in Wetland and Riparian Vegetation. [17]</b>                      A lowered watertable can dry up wetlands, stress or kill mature riparian vegetation, and reduce or eliminate seedling survival.<sup>40</sup></p>	<p>1) Identify types and areas of wetlands and riparian areas that would be affected by expected lowering of shallow water tables and map locations.                      2) Identify mitigation.</p>

CAUSE	EFFECT	NEEDED ANALYSES
<b>11. CHANNEL DESTABILIZATION</b>	<p><b>C. Impaired Beneficial Uses. [18]</b>                      A lowered watertable can impair water supply and other beneficial uses which use groundwater. Seawater intrusion is possible in coastal areas.<sup>41</sup> Aquifer compaction and subsidence can also occur.<sup>42</sup> Wetland and riparian areas can be dewatered, harming associated vegetation and habitats.<sup>43</sup></p>	<p>1) Identify affects of expected water table lowering on water supply and other beneficial uses and map locations.                      2) Identify mitigation.</p>
	<p><b>A. Channelization. [3]</b>                      Channel erosion can threaten property and structures, leading to placement of riprap or other engineered stabilization of critical sections.<sup>45</sup></p>	<p>1) Identify stream reaches in which project-induced channel destabilization may require channelization.                      2) Identify mitigation.</p>
	<p><b>B. Change in Groundwater Storage. [10]</b>                      Channel incision can dewater shallow aquifers adjacent to the channel.<sup>46</sup></p>	<p>1) Identify and map stream reaches in which project-induced stream incision may dewater shallow aquifers.                      2) Identify mitigation.</p>
	<p><b>C. Increased Pollutant Delivery. [13]</b>                      Channel erosion can result in increased suspended solids and turbidity in the water column.<sup>47</sup></p>	<p>1) Identify and map stream reaches subject to project-induced destabilization, quantify changes in channel dimension, and volume of eroded material for each affected basin.                      2) Identify mitigation.</p>
	<p><b>D. Increased Flooding Frequency. [14]</b>                      Channel aggradation can cause local flooding by diverting flows and decreasing a stream's flow capacity.<sup>48</sup></p>	<p>1) Identify and map stream reaches in which project-induced channel destabilization may cause aggradation and associated flooding.                      2) Identify mitigation.</p>
	<p><b>E. Change in Water Temperature. [15]</b>                      Bank erosion and aggradation can increase water temperature by creating a broader channel with shallow flows, increased water surface relative to flow volume, and a smaller proportion of shaded water surface. As a result, summer water temperatures and daily and seasonal temperature fluctuations tend to be greater.<sup>49</sup></p>	<p>1) Identify and map stream reaches in which project-induced destabilization can increase water temperature.                      2) Identify mitigation.</p>
<p><b>F. Change in Wetland and Riparian Vegetation. [17]</b>                      Channel destabilization can encroach on riparian wetlands and undermine streamside vegetation.<sup>50</sup></p>	<p>1) Identify, characterize, and map wetland and riparian areas subject to encroachment by channel destabilization;                      2) Identify mitigation.</p>	

CAUSE	EFFECT	NEEDED ANALYSES
12. CHANGE IN BASEFLOW	<p><b>G. Impaired Beneficial Uses. [18]</b>                      Channel destabilization can reduce or eliminate habitat, recreation, esthetic values, and other uses by affecting deep pools, pool-riffle ratios, undercut banks, substrate suitability, and other structural features.<sup>51</sup></p>	<p>1) Identify, characterize, and map stream reaches in which channel destabilization can directly impair beneficial uses.                      2) Identify mitigation.</p>
	<p><b>H. Increased Maintenance and Property Damage. [19]</b>                      Channel erosion can undermine streamside buildings, bridges, utility crossings, and other property. Aggradation can bury diversion structures and other infrastructure and may require removal to maintain flow capacity.</p>	<p>1) Identify and map stream reaches in which destabilization may cause increased maintenance and property damage.                      2) Identify mitigation.</p>
	<p><b>A. Change in Groundwater Storage. [10]</b>                      Reduced stream baseflow can decrease groundwater recharge by reducing wetted area and the amount of water available for recharge in stream channels.<sup>52</sup></p>	<p>1) Identify and map affected stream reaches.                      2) Quantify losses of recharge and water table response.                      3) Identify mitigation.</p>
	<p><b>B. Change in Water Temperature. [15]</b>                      Decreased baseflow, typically resulting from change in groundwater storage, can cause elevated and fluctuating stream temperature because groundwater usually enters the stream at cool, stable temperatures.<sup>53</sup></p>	<p>1) Identify and map affected stream reaches;                      2) Quantify temperature effects along stream profile.                      3) Identify mitigation.</p>
	<p><b>C. Change in Wetland and Riparian Vegetation. [17]</b>                      Decreased stream baseflow can cause riparian vegetation to shift to upland species.<sup>54</sup></p>	<p>1) Characterize and map affected riparian areas.                      2) Identify mitigation.</p>
<p><b>D. Impaired Beneficial Uses. [18]</b>                      1. Decreases in the amount or duration of baseflow can impair habitat quality by eliminating aquatic and riparian habitat area, reducing flow velocities, and otherwise disrupting the life cycles of plants and animals which are dependent on water.<sup>55</sup>                      2. Increases in baseflow resulting from dry weather discharge can impair waterbodies such as seasonal wetlands, vernal pools, and intermittent streams which are naturally defined by seasonal water availability.</p>	<p>1) Identify and map affected waterbody segments.                      2) Characterize and quantify changes in baseflow.                      3) Identify direct effects on beneficial uses                      4) Identify mitigation.</p>	

CAUSE	EFFECT	NEEDED ANALYSES
<b>13. INCREASED POLLUTANT DELIVERY</b>	<b>A. Impaired Beneficial Uses. [18]</b> Urban pollutants can impair many beneficial uses, e.g., water supply, recreation, fish and wildlife habitat, and shellfish production. <sup>56</sup>	1) Identify direct effects of increased pollutant loadings on beneficial uses in each affected waterbody segment. 2) Identify mitigation.
<b>14. INCREASED FLOODING FREQUENCY</b>	<b>A. Channelization. [3]</b> Increased flooding can lead to channelization of the critical section to more efficiently pass flood flows. <sup>57</sup>	1) Identify stream reaches in which project-induced flooding may require channelization. 2) Identify mitigation.
	<b>B. Impaired Beneficial Uses. [18]</b> Increased flooding can impair habitat, <sup>58</sup> water supplies, navigation, and other beneficial uses.	1) Identify stream reaches in which project-induced flooding may impair beneficial uses. 2) Identify mitigation.
	<b>C. Increased Maintenance and Property Damage. [19]</b> Increased flood frequency can result in more maintenance and flood damage.	1) Identify stream reaches in which project-induced flooding may increase maintenance and property damage. 2) Identify mitigation.
<b>15. INCREASED WATER TEMPERATURE</b>	<b>A. Impaired Beneficial Uses. [18]</b> Increased water temperature can directly stress aquatic biota and can also affect other parameters associated with habitat quality, such as dissolved oxygen concentration and rate of chemical reactions. <sup>59</sup>	1) Identify and map affected waterbody segments. 2) Quantify temperature changes. 3) Characterize effects on beneficial uses. 4) Identify mitigation.
<b>16. DECREASED POLLUTANT REMOVAL</b>	<b>A. Increased Pollutant Delivery. [13]</b> Less removal of pollutants by natural processes can result in greater concentrations of pollutants in receiving waters. <sup>60</sup>	1) Quantify effects to pollutant loadings for each affected waterbody. 2) Identify mitigation.
<b>17. CHANGE IN WETLAND AND RIPARIAN VEGETATION</b>	<b>A. Channel Destabilization. [11]</b> Loss of vegetation and its associated anchoring root masses can destabilize channel banks and other geomorphic features. <sup>61</sup>	1) Characterize and map affected geomorphic features. 2) Identify mitigation.
	<b>B: Change in Water Temperature. [15]</b> Loss of riparian vegetation can increase maximum water temperature by exposing more water surface to the sun. Daily and seasonal temperature fluctuations also tend to be greater. <sup>62</sup>	1) Identify and map stream reaches in which loss of riparian vegetation can increase water temperature. 2) Identify mitigation.
	<b>C. Decreased Pollutant Removal. [16]</b> Removal of vegetation adjacent to a waterbody can reduce removal of pollutants from the waterbody and from the overland flow draining to the waterbody. <sup>63</sup>	1) Describe type, areal extent, and pollutant removal value of affected vegetation and map location. 2) Identify mitigation.

CAUSE	EFFECT	NEEDED ANALYSES
	<p><b>D. Impaired Beneficial Uses. [18]</b>                      Loss of vegetation directly impairs the quality of aquatic and riparian habitat by reducing cover, structural diversity, and nutrient sources.<sup>64</sup> Removal of vegetation can also fragment and isolate remaining patches of habitat, resulting in decreased habitat value over large areas.<sup>65</sup></p>	<ol style="list-style-type: none"> <li>1) Identify affected waterbody segments.</li> <li>2) Characterize direct effects of vegetation loss on beneficial uses.</li> <li>3) Characterize and display at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity.</li> <li>4) Identify effects of vegetation change on terrestrial and aquatic habitat connectivity.</li> <li>5) Identify mitigation.</li> </ol>



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- <sup>31</sup> USEPA 1993b, pp. 3, 30.  
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- <sup>32</sup> Booth 1990.  
Patton 1981, cited in Arnold et al 1982.
- <sup>33</sup> Knutson 1997, p.70.  
Terrene Institute, 1994, p.1.  
USEPA 1993b, p. 15, 32.
- <sup>34</sup> Ca SWRCB 1994a, p.31.  
Ca SWRCB 1994b, p. 3.  
Dunne and Leopold 1978, pp. 276-77, 695.  
USEPA 1993b, p.17.  
Mount 1995, p. 290-291.  
Booth 1990.  
Kondolf and Keller 1991.  
Arnold et al 1982.  
Klein 1979.  
Schueller 1994. USEPA 1993a pp. 4-5 - 4-10.
- <sup>35</sup> Ca SWRCB 1994b, p. 4.  
Terrene Institute 1994, p.4.  
US Fed Interag Str Rest Wk Gp 1998, p.3-27.  
Knutson 1997, pp.70, 70-71.  
Schueller 1994.  
USEPA 1993a pp. 4-5 - 4-10.
- <sup>36</sup> Klein 1979,  
Borchardt and Statzner 1990.
- <sup>37</sup> USEPA 1993b, pp.30, 35-38.
- <sup>38</sup> USEPA 1993a pp. 4-5 - 4-10
- <sup>39</sup> Ca SWRCB 1994b, p. 3.  
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US Fed Interag Str Rest Wk Gp 1998, pp. 1-15, 3-24.  
Dunne and Leopold 1978, pp. 225, 277.  
USFWS 1982, p.34.  
USEPA 1993b, p. 17, 30.  
Klein 1979.  
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- <sup>40</sup> USFWS 1982, p. 73.  
Kondolf and Curry 1986.
- <sup>41</sup> Dunne and Leopold 1978, p. 225
- <sup>42</sup> Dunne and Leopold 1978, p. 227-229.
- <sup>43</sup> USEPA 1993b, p. 30.  
USEPA 1993a pp.6-4 – 6-6
- <sup>44</sup> Ca SWRCB 1994a, p. 31.  
Dunne and Leopold 1978, p. 404.  
Mount 1995, p. 305.  
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USFWS 1982, pp.39, 100.  
Arnold et al 1982.
- <sup>45</sup> Dunne and Leopold 1978, p.703.  
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USEPA 1993a pp. 4-5 – 4-10.
- <sup>46</sup> Ca SWRCB 1994a, p. 31
- <sup>47</sup> US Fed Interag Str Rest Wk Gp 1998, pp. 3-24, 3-25.  
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- <sup>48</sup> Mount 1995, p. 305.
- <sup>49</sup> Knutson 1997, p.71.  
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- <sup>50</sup> Ca SWRCB 1994b, p. 3.  
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- <sup>51</sup> Ca SWRCB 1994a, p. 31.  
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- <sup>52</sup> USFWS 1982, p.69.
- <sup>53</sup> Klein 1979.
- <sup>54</sup> USEPA 1993b, p.37.
- <sup>55</sup> USEPA 1993b, p.30, 37.  
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- <sup>56</sup> Ca SWRCB 1994b, p. 4.  
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Borchardt and Statzner 1990.  
USEPA 1993a pp. 4-5 – 4-10.
- <sup>57</sup> Mount 1995, pp.287, 305.
- <sup>58</sup> USEPA 1993b, pp.36-38.  
Schueller 1994.

- <sup>59</sup> Terrene Institute 1994, p.4.  
USFWS 1982, pp.39, 56.
- <sup>60</sup> Ca SWRCB 1994a, p.22.
- <sup>61</sup> Terrene Institute 1994, p.26.  
US Fed Interag Str Rest Wk Gp 1998, pp.3-14, 3-16.  
USFWS 1982, pp.54, 73.  
Knutson 1997, p.69.  
Kondolf and Curry 1986.
- <sup>62</sup> Terrene Institute 1994, p.26.  
USFWS 1982, pp. 39, 54.  
Knutson 1997, pp. 69, 71.  
US Fed Interag Str Rest Wk Gp 1998, pp. 3-16, 3-25.  
Mount 1995, p.308.  
Klein 1979.  
USEPA 1993A pp. 4-5 - 4-10.
- <sup>63</sup> Ca SWRCB 1994a, p. 22.  
Knutson 1997, p.69.  
Terrene Institute 1994, p. 26.  
US Fed Interag Str Rest Wk Gp 1998, pp. 2-9, 3-27.  
USFWS 1982, pp. 54, 62.
- <sup>64</sup> Ca SWRCB 1994a, p.22.  
Knutson 1997, pp.19-38, 69.  
USFWS 1982, p.54.
- <sup>65</sup> Burke 1995, pp. 1365-1369  
Dodd 1998, pp. 331-339  
Findley 1997, pp. 1000-1009  
Hilty 2004, pp. 126-135  
Joyal 2001, pp. 1755-1762  
Knutson 1997, p. 32, 71.  
National Research Council 2001, p. 42  
Nature Conservancy 2000, p. 10  
Noss 1994, pp. 33-34, 50-54, 59-62  
Parmesan 2003, pp. 37-42  
Pounds 2004, pp. 107-109  
Rool 2003, pp. 57-60  
Saunders 1991, pp. 18-32  
Semlitsch 1997, pp. 1113-1119  
Semlitsch 1998, pp. 1129-1133  
Soulé 1991, pp. 313-323  
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US Fed Interag Str Rest Wk Gp 1998, pp. 2-80 - 2-82.



# POTENTIAL EFFECTS OF URBAN DEVELOPMENT ON BENEFICIAL USES

This diagram shows how urban development can affect beneficial uses of water.

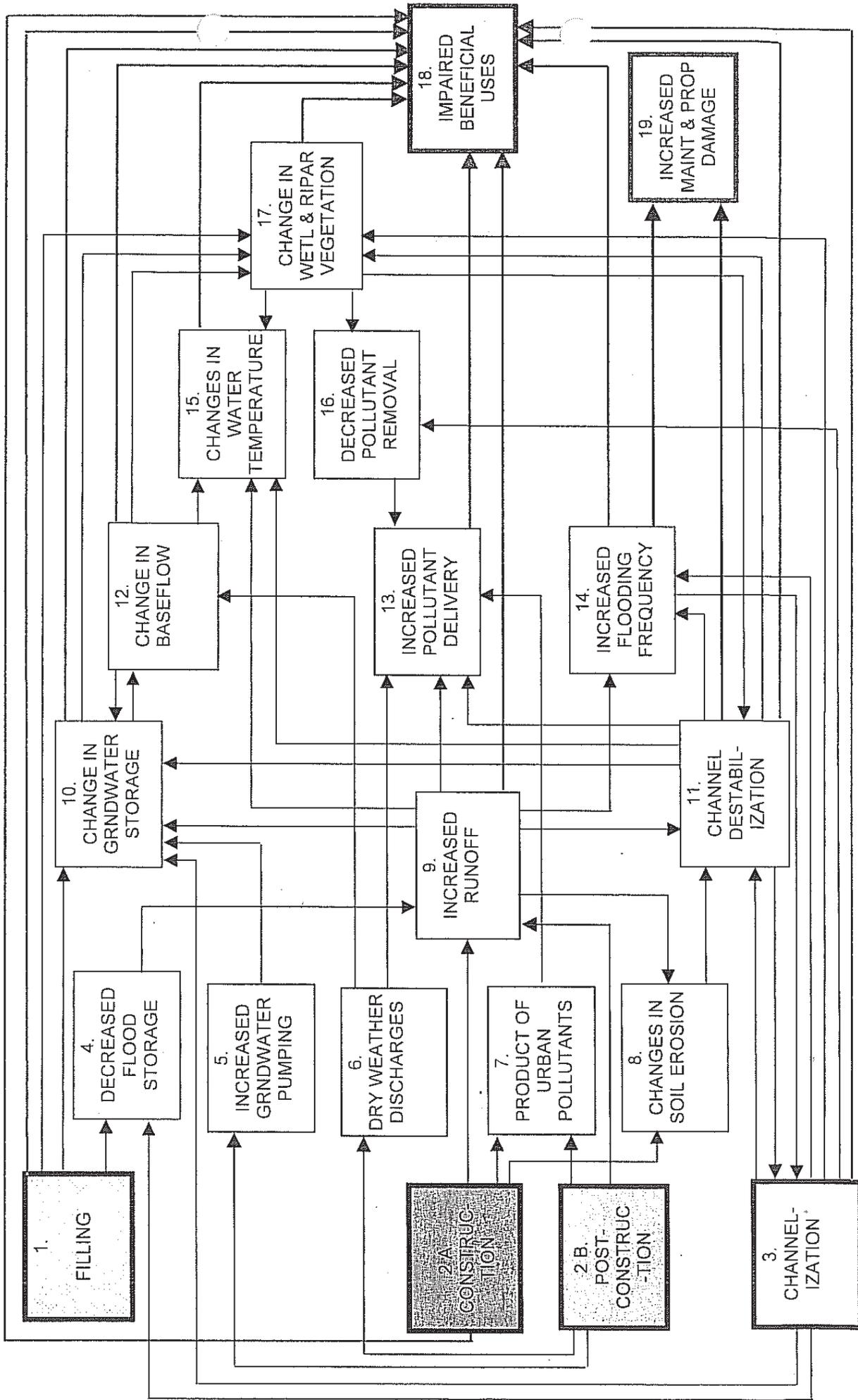


Figure 1



## Low-Impact Development References

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Low-impact (LID) development generally involves more compact development that:

- minimizes generation of urban pollutants;
- preserves the amenity and other values of natural waters;
- maintains natural waters, drainage paths, landscape features and other water-holding areas to promote stormwater retention and groundwater recharge;
- designs communities and landscaping to minimize stormwater generation, runoff, and concentration; promote groundwater recharge; and reduce water demand;
- promotes water conservation and re-use.

The following documents are among many that provide more specific guidance in LID.

---

Bay Area Stormwater Management Agencies Association. Start at the Source. 1999. Online: <http://www.basmaa.org/index.cfm>.

Center for Watershed Protection. Better Site Design: A Handbook for Changing Development Rules in Your Community. August 1998. Online: <http://www.cwp.org/>.

Local Government Commission. The Ahwahnee Water Principles: A Blueprint for Regional Sustainability. July 2006. Online: <http://water.lgc.org/guidebook>.

Prince George's County, Maryland, Department of Environmental Protection. Low-Impact Development Design Strategies. January 2000.

Prince George's County, Maryland, Department of Environmental Protection. Low-Impact Development Hydrologic Analysis. January 2000.

United States Environmental Protection Agency. Using Smart Growth Techniques as Stormwater Best Management Practices. EPA 231-B-05-002. December 2005.

United States Environmental Protection Agency. Parking Spaces/Community Places. EPA 231-K-06-001. January 2006.

United States Environmental Protection Agency. Protecting Water Resources with Higher Density Development. EPA 231-R-06-001. January 2006.

United States Environmental Protection Agency. Growing Toward More Efficient Water Use: Linking Development, Infrastructure, and Drinking Water Policies. EPA 230-R-06-001. January 2006.

### Further Online References:

Ca. Office of Environmental Health Hazard Assessment: <http://www.oehha.ca.gov/ecotox.html>

United States Environmental Protection Agency: <http://www.epa.gov/smartgrowth/>



State Water Resources Control Board

**Terrestrial Habitat Connectivity Related To  
Wetland, Riparian and Other Aquatic Resources,**

## Terrestrial Habitat Connectivity as Related To Wetland, Riparian, and Other Aquatic Resources

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"Habitat connectivity" refers to the need for plant and animal populations to have some mobility over the landscape, i.e., to avoid becoming "isolated" or "disjunct."<sup>1</sup> A large body of research has demonstrated that such "isolated" populations face a high probability of eventual extinction, even if their immediate habitats are spared.<sup>2</sup> In general, the smaller such an isolated population, the more quickly it will die out. Urban development typically fragments habitat by creating artificial landscapes which are movement barriers for most species. Unless mitigation measures are taken, isolated, non-viable populations are created as buildings, roads, and landscaping cut off lines of movement.

In the context of wetlands, "habitat connectivity" refers to three related phenomena:

- a. The need of some animals to have access to both wetland and upland habitats at different parts of their life cycle. Some wetland animals, e.g., some amphibians and turtles, require access at different seasons and/or at different life stages to both wetland and to nearby upland. Preserving the wetland but not access to upland habitat will locally exterminate such species.<sup>3</sup>
- b. The ecological relationship between separate wetlands. Some wetland communities and their associated species comprise networks of "patches" throughout a landscape. Wetland plants and animals are adapted to the presence of wetland complexes within a watershed and are dependent on moving among the wetlands within the complex, either regularly or in response to environmental stressors such as flood or drought, local food shortage, predator pressure, or influx of pollution. Removing one such water from the complex will reduce the biological quality of the rest, and at some point the simplified wetland complex will be incapable of supporting at least some of the species, even though some wetlands remain.<sup>4</sup>
- c. The role wetlands and riparian corridors play in allowing larger-scale movements. Some strategically located wetlands and continuous strips of riparian habitat along streams facilitate connectivity at watershed and regional scales for terrestrial as well as aquatic and amphibious species.

As noted above, habitat connectivity is critical to biodiversity maintenance, and will become more so because of global warming. Significant range shifts and other responses to global warming have already occurred. The ability of biotic populations to move across the landscape may be critical to their survival in coming decades.<sup>5</sup>

<sup>1</sup> Such mobility may occur at the level of the individual organism (e.g., a bird or turtle travelling between separated wetlands) and/or of the population (e.g., a plant species colonizing a new wetland through seed dispersal); and over different time scales.

<sup>2</sup> For the effects of habitat fragmentation and population isolation on the survival of plants and animals, see for example:

K. L. Knutson and V.L. Naef, *Management Recommendations for Washington's Priority Habitats: Riparian*, Washington Dept. of Fish and Wildlife, Olympia, WA, December 1997, p. 71.

R.F. Noss and A.Y. Cooperrider, *Saving Nature's Legacy; Protecting and Restoring Biodiversity*, Washington, D.C., Island Press, 1994, pp. 33-34, 50-54, 59-62, 61-62.

D.E. Saunders, R.J. Hobbs, and C.R. Margules, "Biological Consequences of Ecosystem Fragmentation: A Review," *Conservation Biology* 5(1), March 1991, pp. 18-32.

Michael E. Soulé, "Land Use Planning and Wildlife Maintenance, Guidelines for Conserving Wildlife in an Urban Landscape," *Journal of the American Planning Association* 57(3), 1991, pp. 313-323.

Michael E. Soulé, "The Effects of Habitat Fragmentation on Chaparral Plants and Vertebrates," *Oikos* 63, 1992, pp. 39-47.

United States Federal Interagency Stream Restoration Working Group, *Stream Corridor Restoration: Principles, Practices, and Processes*, October 1998, [Online]. Available from: [http://www.usda.gov/stream\\_restoration](http://www.usda.gov/stream_restoration). Printed copy available from: National Technical Information Service (NTIS), Springfield, VA, pp. 2-80, 2-82.

<sup>3</sup> Regarding the relationship between wetland/riparian and upland habitats, see for example:

Vincent J. Burke and J. Whitfield Gibbons, "Terrestrial Buffer Zones and Wetland Conservation: A Case Study of Freshwater Turtles in a Carolina Bay," *Conservation Biology* 9(6), 1995, pp. 1365-1369;

C. Kenneth Dodd, Jr. and Brian S. Cade, "Movement Patterns and the Conservation of Amphibians Breeding in Small Temporary Wetlands," *Conservation Biology* 12(2), 1998, pp. 331-339;

Raymond D. Semlitsch, "Biological Delineation of Terrestrial Buffer Zones for Pond Breeding Salamanders," *Conservation Biology* 12(4), 1997, pp. 1113-1119.

Hilty, J. A. and Merenlender, A. M. Use of Riparian Corridors and Vineyards by Mammalian Predators in Northern California. *Conservation Biology* 18(1) 126-135; 2004 February.

<sup>4</sup> Regarding the ecological relationship between separated wetlands, see for example:

C. Scott Findley and Jeff Houlahan, "Anthropogenic Correlates of Species Richness in Southeastern Ontario Wetlands," *Conservation Biology* 11(4), 1997, pp. 1000-1009;

Lisa A. Joyal, Mark McCollough, and Malcom L. Hunter, Jr., "Landscape Ecology Approaches to Wetland Species Conservation: A Case Study of Two Turtle Species in Southern Maine," *Conservation Biology* 15(6), 2001, pp. 1755-1762;

Raymond D. Semlitsch and J. Russell Bodie, "Are Small, Isolated Wetlands Expendable?" *Conservation Biology* 12(5), 1998, pp. 1129-1133;

National Research Council, *op. cit.*, 2001, p. 42;

Nature Conservancy, *op. cit.*, July 2000, p. 10.

<sup>5</sup> Recent reports comprehensively review observed effects of global change on plant and animal range shifts, advancement of spring events, and other responses. See:

Terry L. Root, Jeff T. Price, Kimberly R. Hall, Stephen H. Schneider, Cynthia Rosenzweig, and Alan Pounds, "Fingerprints of Global warming on Wild Animals and Plants," *Science* 421:2, January 2003, pp. 57-60.

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Camille Parmesan and Gary Yohe, "A Globally Coherent Fingerprint of Climate Change Impacts cross Natural Systems," *Science* 421:2, January 2003, pp. 37-42.

Thomas, et al. "Extinction risk from climate change", *Nature* 427, January 2004, pp. 145-148

## Town\_Country

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**From:** Diane Carlton [dianec@gavar.org]  
**Sent:** Wednesday, September 14, 2011 4:56 PM  
**To:** Town & Country  
**Cc:** Edel Vizcarra ; nhickling@lacbos.org  
**Subject:** Response to Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

September 14, 2011

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Ms. Hua:

I am hereby responding to the above stated Notice of Preparation (NOP). I am opposed to exclusively utilizing the proposed goals, policies, implementing programs, land use designations (density and intensity) in the Draft Antelope Valley Area Plan: Town & Country (Draft Plan) for the Environmental Impact Report (EIR) study. The Draft Plan is currently under active review by the community, and has not yet been fully vetted for use in an EIR. Accordingly, I am requesting the EIR study include the range of land use designations associated with the current Land Use Plan and the Draft Plan.

Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, I have a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The downzoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. In 2010 the median home sales price in the high desert was \$125,550 and was the most affordable housing region in the State, during a time when the County median sales price was \$346,840. The downzoning resulting from the proposals found in the Draft Plan must result in an upzoning in other, less-affordable areas, as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County will be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented. Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

Government agencies implementing SB 375 should not regard development, or the prohibitions of development, as the sole solutions for meeting their Greenhouse Gas (GHG) emission reduction target. Housing affordability, construction costs and other economic impacts must be considered when evaluating measures proposed for meeting the goals of SB 375.

As stated in the Notice,

“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of my request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, I request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,  
Diane Carlton  
Quartz Hill, CA

[diane.carlton@roadrunner.com](mailto:diane.carlton@roadrunner.com)

## Town\_Country

---

**From:** Dan Silver [dsilverla@me.com]  
**Sent:** Wednesday, September 14, 2011 4:43 PM  
**To:** Town & Country  
**Subject:** Notice of Preparation for Antelope Valley Area Plan Update EIR

September 14, 2011

*VIA ELECTRONIC MAIL ONLY*

Thuy Hua, AICP  
Department of Regional Planning  
County of Los Angeles

### **RE: Notice of Preparation for Antelope Valley Area Plan Update EIR**

Dear Mr. Hua:

The Endangered Habitats League (EHL), Southern California's only regional conservation organization, respectfully submits the following comments on the Notice of Preparation of an Environmental Impact Report for the draft Antelope Valley Area Plan Update.

EHL is encouraged to note that a rural preservation strategy is a key component of the Updated draft plan. Accomplishing this laudable objective, while at the same time providing for an adequate supply of housing and establishing the basis for economically healthy communities, will be a challenging, yet necessary task if the draft plan is to meet sustainability goals.

Fortunately, there exist several planning tools that can advance these goals, including Urban Growth Boundaries (UGBs), Transferable Development Rights (TDR) programs, Purchase of Development Rights (PDR) programs, and capacity-based residential caps for designated areas. EHL requests that the County consider these tools as it refines the Project and feasible alternatives in the EIR process.

In particular, EHL encourages the development of an Town Center alternative whereby a UGB would define Town Center Development Area(s) within the plan area (or even within municipal boundaries with the cooperation of that jurisdiction). Here, where adequate infrastructure exists and located to minimize transportation impacts, increased densities could be attained by "retiring" outlying rural residential units through a TDR program. In this way, open space, habitat, and aesthetic values could be preserved or enhanced while providing for appropriate and sustainable development. Given impending development pressures, EHL believes that such a program is necessary to achieve the Update's rural preservation goals.

We would be happy to meet with Regional Planning Staff to discuss this concept in further detail.

If you would acknowledge your timely receipt of these comments by return message, that would be appreciated. Also, please place EHL on all distribution and notification lists for the Project, such as CEQA documents and public hearings.

Thank you for your consideration.

Very truly yours,

Dan Silver MD  
Executive Director

Dan Silver, Executive Director  
Endangered Habitats League  
8424 Santa Monica Blvd., Suite A 592  
Los Angeles, CA 90069-4267

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Clark Stevens, AIA

September 14, 2011

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

**RE: NOP- EIR Comments for the Los Angeles County General Plan Update**

Dear Ms. Chung,

On behalf of the Resource Conservation District of the Santa Monica Mountains (RCDSMM), we thank you for the opportunity to submit comments on the NOP for the Los Angeles County General Plan Update. We would like the following to be addressed in the EIR for the Plan Update:

General Comments:

- What is the vision for how LA County will function in 50 years?
- How will implementation of this General Plan translate into on the ground stewardship and sustainability?
- What metrics will be used to evaluate the effectiveness of these policies?
- Have any metrics been used to evaluate the goals of the 1986 plan vs. what is currently on the ground? An assessment of what worked or did not would be extremely helpful in guiding the future course of planning.
- We recommend that you incorporate the "let the land dictate the use" principle of the Santa Monica Mountains North Area Plan into the general plan.
- How will the updated plan integrate ecosystems services cost-benefit analysis in all aspects of planning?

- How will the County promote an integrated environmental site analysis into the first steps of the planning process to ensure that ecosystem elements are identified and considered so that preliminary designs brought for evaluation by the Initial Study are clearly aligned with the goals and policies of the General Plan?
- Will Public Works and Utilities be required to adhere to all the environmental constraints required of private parties? If not, why not?
- In the Implementation Plan, the Green Streets Initiative should specify that climate-appropriate (and preferably California natives) will be used as the material for landscaping "urban green spaces".
- The plan should recognize and integrate long term processes into the evaluation of potential impacts to allow for ecological resiliency. This requires on-going dialogue and implementation of up to date information from local scientists that can be integrated into the planning process.

#### Land Use:

- 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 should reconfigure zoning to reflect those issues and direct development into better locations.
- How can preservation of agricultural opportunities be integrated with wise management and conservation of chaparral and other native ecosystems?
- Land use compatibility narrative should also consider impacts to open space from fuel modification, type conversion from native habitats to agriculture.

#### Planning for Sustainable and Livable Communities Section:

How can infrastructure services (energy, water, sewer, trash, etc.) 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?

- Sustainable Subdivision Design should also recommend preventing habitat fragmentation, retention of storm water, localized production of appropriate energy, water conservation and reuse

#### Air Quality:

- Responding to climate change section 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.

### Conservation and Open Space

- How are private open space easements tracked and monitored?
- We agree that a coordinated open space master plan is needed.
- Since open space can include anything from golf courses to wildlands, what are the guidelines for designating specific requirements for open space preservation and integration into the fabric of wild lands?
- It is important to identify and call out dark sky role as important resource ; regulation of night lighting and providing places where residents can see the stars very important.

### Biological Resources:

- In Appendix C. 1, do the Special Management Areas overlap? If they do, the County should provide 3 separate maps to depict Special Management Areas 1, 2 and 3.
- What are the criteria or methods used to update the Significant Ecological Areas? Does the County provide SEA's as a parcel-level layer in the GIS maps online? This would facilitate evaluating impacts of individual projects on these areas.
- Please label the Regional Wildlife Linkage Areas in Figure 6.3 of the General Plan Update.
- How will the County specifically support or implement the L.A. County Oak Woodlands Conservation Management Plan? Will it be part of the policy and or goals of the Conservation Element? The text box on page 109 should reflect adoption of Part 1 of the Oak Woodlands Conservation Management Plan in August 2011. We are appreciative of the inclusion of this in the General Plan Update.
- One goal of the Conservation Element should be to provide a measurable distance of setback between new development and riparian zones.
- The Plan Update should identify the relationship between fuel modification requirements and type conversion of native habitats, and provide policy guidance to reduce these impacts, especially adjacent to public open spaces.

### Open Space:

- How are private open space easements tracked and monitored? We agree that a coordinated open space master plan is needed.
- Since open space can include anything from golf courses to wild lands, what are the guidelines for designating specific requirements for open space preservation and integration into the fabric of wild lands?

### Water Quality/Resources:

- The Plan should identify ways that each landowner can implement water conservation through rainwater harvesting, infiltration, reuse, etc.

- Marine Protected Areas information should be added to the section following discussion on Areas of Special Biological Significance on pg 112.
- Given the requirements of TMDL's and other regulatory standards, we need to make clear connection between sources of bacteria and pathogenicity.

#### Agriculture:

- Vineyards are not identified as a commodity in Table 6.2 (pg 116) and should be added.
- The plan should review agricultural resource areas and correlate these with remaining native vegetation communities to identify and track impacts.
- The plan should identify and implement strict standards for protecting slopes from agricultural conversion that results in erosion, sedimentation and slope failure.

#### Mineral and Energy Resources:

- Prioritize local sources of energy 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.

#### Scenic Resources:

- The plan should implement stringent regulations to avoid impacts of ridgetop development.
- Many other highways throughout the County provide significant vistas. Additional potential scenic highway designations to protect other important transportation corridor vistas should be considered.

#### Historical, Cultural and Archeological Resources:

- The plan should recognize 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.

#### Parks and Recreation:

- 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. Continue implementation of pocket parks wherever possible.

### Safety:

- 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.

### Public Services and Facilities:

- 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.

### Water:

- With only 33% of water supply local, conservation and landscape restrictions are critical!

### Wastewater and sewer:

- The plan should recognize 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 program that can be fairly and equitably be implemented is critical.

### Utilities:

- Siting should 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, and 4) reduce system wide malfunctions.
- Utility companies should comply with all best management practices and environmental protection standards imposed on private developers.

### Economic Development:

- Given the need for promoting jobs locally, provide an integrated plan that connects jobs more directly to transportation and housing by clustering.
- Recognize that economic growth in LA County is directly tied to our environment - extensive portions of local economy tourist driven and reliant upon a functional ecosystem from the beaches to the mountains. Avoid fostering short-term growth at the expense of long term sustainability and economic value.

## IMPLEMENTATION PLAN:

The plan should identify and incorporate incentives for land conservation via easements or dedications accompanied by property tax reductions.

### Environmental Resource Management

- Habitat Conservation Planning should extend to all native ecosystems, and incorporate an effective tracking system to provide annual assessment of changes to biological resources countywide.
- We also recommend adding the following issues to the Environmental Resource Management Table:

#### **Invasive species Tracking and Response Strategy:**

This is critical to manage introduced threats such as the Gold Spotted Oak Borer and New Zealand Mud Snail, which can dramatically reduce ecosystem viability and cause significant mortality.

#### **Ecosystem response to climate change and type conversion:**

This would allow the County to monitor landscape level changes to local ecosystems related to fire frequency, development and shifts in species distribution and abundance in response to climate changes. An early warning system such as this could be developed in collaboration with local scientists and universities to provide the county with the opportunity for rapid response to region wide changes.

### Agricultural Monitoring Program

- Vineyard expansion into native ecosystems, especially on steep slopes has potentially significant impacts, as does that from orchard, row crop or animal husbandry. The County General Plan should provide for tracking such change and develop appropriate guidelines to promote needed agriculture developed such that natural systems remain functional as well.

### Water Resources Program

- The Water Quality Initiatives section should also include education and potentially regulations to reduce urban run off from landscaping.
- The Watershed and River Master Plan should include work to restore the Los Angeles and San Gabriel rivers, as well as Ballona Creek.
- Water conservation should emphasize onsite reuse via rainwater harvesting (cisterns, graywater, etc.) and in general should seek to slow and naturalize stormwater runoff and avoid creating hardened and focused discharges

### Special Management Area Programs:

- We support the development of countywide ridgeline protection regulations.
- Why is the Local Coastal Plan not listed here?

- Floodplain management goals are only as good as the calculations that determine the extent of the flood zone. The Plan should ensure that the reference condition used to develop Q values is the natural, undisturbed condition, rather than a 50 year bulk and burned Q. The Plan should also incorporate protection to downstream properties when upstream development alters the hydrologic regime of a waterway.
- The Implementation Section is missing a critical element of self-evaluation and identification of benchmark metrics that would provide the County with on-going feedback regarding whether the goals and policies of the plan are being met.

We are thankful for the opportunity to participate during the scoping phase of the EIR the Los Angeles County General Plan Update. As a Resource Conservation District, we support sustainable land use: growth balanced with conservation of the unique and finite natural resources of the County. We also understand the importance of this planning document as a guide for responsible stewardship within the County.

If you have any questions regarding this letter please contact me directly.

Sincerely,

Clark Stevens  
Executive Officer



333 South Hope Street | 43rd Floor | Los Angeles, CA 90071-1422  
213-620-1780 office | 213-620-1398 fax | [www.sheppardmullin.com](http://www.sheppardmullin.com)

Writer's Direct Line: 213-617-5567  
[afraijs@sheppardmullin.com](mailto:afraijs@sheppardmullin.com)

Our File Number: 23EH-151714

September 14, 2011

**VIA E-MAIL AND U.S. MAIL**

Ms. Connie Chung  
Los Angeles County  
Department of Regional Planning  
320 W. Temple Street Rm. 1356  
Los Angeles, California 90012

**Re: Comment on Town and Country Plan for the Antelope Valley, Los Angeles County, California**

Dear Ms. Chung,

We are writing in response to the Notice of Preparation for the Los Angeles County General Plan Update and the Antelope Valley Area Plan Update in order to call your attention to areas warranting analysis in the environmental impact report for the Los Angeles County Town and Country Plan for the Antelope Valley ("EIR"). The EIR should analyze whether the proposed San Andreas SEA and its linkages actually provide wildlife movement benefits given the existing infrastructure and natural constraints in the area. As set forth below, there are existing impediments – most significantly the aqueduct itself – that hinder north-south wildlife movement, thereby limiting the environmental benefits gained by extending the San Andreas SEA boundaries north of the California Aqueduct. At the same time, inclusion of additional lands within the San Andreas SEA boundaries triggers additional restrictions and mitigation requirements that greatly increase the cost of developing renewable energy on that land.

In addition, the EIR should study whether the environmental benefits of extending the proposed San Andreas Fault Zone Significant Ecological Area ("San Andreas SEA") north of the California Aqueduct outweigh the environmental costs associated with placing additional restrictions and mitigation requirements onto land that might otherwise be used for renewable energy production. Given the environmental benefits, including air quality benefits, of increased renewable energy production, it is important to study whether the desired environmental benefits will actually be achieved before burdening additional lands with the further regulatory requirements that come with inclusion in the San Andreas SEA.

Ms. Connie Chung  
Los Angeles County  
Department of Regional Planning  
September 14, 2011  
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## INTRODUCTION AND BACKGROUND

### 1. The Town and Country Plan and Proposed Policies

The Los Angeles County's Department of Urban Planning is currently updating the Antelope Valley ("AV") Area Plan; a part of the Los Angeles County General Plan. This updated plan is called the Town and Country Plan (the "Plan") and is currently in the public and environmental review process. The Plan includes specific goals for the AV pertaining to biological resources (Goal COS 4), vegetation conservation (Goal COS 16), and energy (Goals COS 10-14). The focus of Goal COS 13 is to provide... "[u]tility-scale energy production facilities for offsite use that reduce consumption of non-renewable resources while minimizing potential impacts on natural resources and existing communities".

The Plan includes several environmental protection policies (e.g. Policies COS 13.1-13) designed to guide the development of utility-scale renewable energy projects within the AV. These policies identify three zones for renewable energy production (Exhibit 1). The High Priority Zone (Zone 1; Policy COS 13.2) require "basic conditions and mitigation measures for utility-scale renewable energy production facilities during the application review process because of the limited potential impacts they may have on known sensitive biotic communities." The Medium Priority Zone (Zone 2; Policy COS 13.3) requires "moderate conditions and mitigation measures for utility-scale renewable energy production facilities during the application review process because of the potential impacts they may have on the Swainson's hawk, Mojave ground squirrel, and desert tortoise species habitats, which are known sensitive biotic communities." Finally, the Low Priority (Zone 3; Policy COS 13.4) require stringent conditions and mitigation measures for utility-scale renewable energy production facilities during the application review process because of the potential impacts they may have on Significant Ecological Areas, which are known sensitive biotic communities.

### 2. Proposed San Andreas Fault Zone SEA

The proposed San Andreas Fault Zone Significant Ecological Area encompasses and connects several existing SEAs including the Portal Ridge SEA No. 58, the Fairmont and Antelope Buttes SEA No. 57, and the Ritter Ridge SEA No. 56 (Exhibit 1, Exhibit 2). The Joshua Tree Woodland SEA No. 60 is not included in this proposed conglomeration and expansion. As stated in *Los Angeles County Significant Ecological Area Update Study 2000; Background Report* (PCR 2000),

Ms. Connie Chung  
Los Angeles County  
Department of Regional Planning  
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*“The SEA designation does not protect biotic resources on land per se, and SEAs are not preserves or conservation areas; rather, SEAs are areas in which planning should be sensitive to resources and maintenance of biological functions as well. By creating larger SEAs, habitat linkage zones are provided between related habitat types (such as the Antelope Valley buttes, or the San Andreas Rift Zone wetlands), and areas of sufficient width, to function as wildlife movement routes between open space areas. The linkages may serve to sustain populational genetic diversity of low-mobility species (such as plants, amphibians, reptiles, rodents), as well as provide refuge areas for migrant species... In short, by “bridging the current SEA islands” wherever possible, zones of lower intensity human impacts between essential habitat resources have been provided, which help maintain overall species and habitat diversity in Los Angeles County.”*

Within the proposed San Andreas SEA, an area between the Portal Ridge and Fairmont and Antelope Buttes SEAs was included as a linkage between these two SEAs (Exhibit 3). At this linkage area “two large washes drain to the Valley floor, namely Myrick Canyon and Willow Springs Canyon. The vegetation transitions to grasslands as the SEA stretches north across the valley floor and encircles Fairmont Butte and the Antelope Buttes of the Antelope Valley California Poppy Reserve” (PCR 2006). According to PCR (2006), “[t]hese washes provide an important linkage for animals traveling between the mountains... and the Mojave Desert.”

## ANALYSIS

### 1. The California Aqueduct Inhibits North-South Linkage

The linkage between SEAs Nos. 57 and 58 is constrained by the California Aqueduct, fencing within the aqueduct right-of-way (ROW), and fencing associated with Fairmont Reservoir, regulated by the Los Angeles Department of Water and Power (LADWP). The California Aqueduct “presents a formidable barrier... to most terrestrial animals, with a 50-m wide expanse of water and paved bank slopes of about 100% (45°) slope” (Penrod et al. 2003) and there are no known (*north-south*) wildlife corridors near the California Aqueduct (URS 2009). Within the proposed linkage area, any movement of terrestrial wildlife must funnel through one of four aqueduct crossings (Exhibit 4). Of these four crossings, two (Myrick Siphon and Willow Springs Siphon) are vegetated areas where the aqueduct passes below ground; the other two crossings are unvegetated bridges that pass over the aqueduct. At Myrick Siphon, any linkage is almost entirely restricted by the presence of a seven foot tall chain link and barb wire security fence that encompasses Fairmont Reservoir (Exhibit 5). With this crossing all but entirely blocked, there are only three crossings at which wildlife can pass the aqueduct within the proposed linkage area. Thus, the importance of the San Andreas SEA between the California Aqueduct and SEA No. 57, for wildlife linkage is further compromised. With such barriers, the importance of this area may not warrant designation as an SEA.

Ms. Connie Chung  
Los Angeles County  
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2. The Proposed Boundary is not Consistent with Linkage Patterns Described in Scientific Literature

Additionally, the boundary of the proposed San Andreas SEA, where it connects the existing SEAs No. 57 and 58, is not consistent with scientific literature describing wildlife movement patterns in this area. According to initial studies (PCR 2006), Myrick and Willow Springs Canyons are specifically cited as the two primary linkage areas between the two existing SEAs. However, the boundary of the new SEA does not follow these canyons. Neither Myrick Canyon nor Willow Springs Canyon connects the Portal Ridge SEA with the Fairmont and Antelope Buttes SEA within the boundaries of the proposed San Andreas SEA. Instead, at both canyons, the proposed SEA boundary ends abruptly within these canyons, creating three "fingers". These three fingers do not connect to SEA No. 57. With both drainages and ridges truncated, the only potential connection that remains within the proposed SEA boundary is along a series of low lying ridges and bottomlands dominated by agriculture, annual grasslands, and wildflower fields. These vegetation types provide little cover for wildlife and are less favored wildlife movement areas for many local terrestrial species (e.g. bobcat, bear, mule deer). Furthermore, the substantial historic and ongoing grazing and agricultural activities throughout the area, including, for example, in areas in and around the former Shea's Castle, should be factored as part of any SEA proposals.

3. SEA Designation Imposes Additional Burdens on Renewable Energy Projects

It is clear from reviewing the Plan that the renewable energy priority zones were established, at least in part, on the basis of the boundaries for the SEAs and not exclusively based on the renewable energy potential of that land. Policy COS 13.4 of the Town And Country Plan states, "In the Low Priority Zone (Zone 3) of the Renewable Energy Production Priority Map, require stringent conditions and mitigation measures for utility-scale renewable energy production facilities during the application review process because of the potential impacts they may have on Significant Ecological Areas, which are known sensitive biotic communities." These additional "stringent conditions and mitigation measures" add significant costs and constraints to a renewable energy project, which could render the project financially infeasible or reduce the energy output of the project. The Plan specifically identifies renewable energy as an important alternative to fossil fuel consumption. This priority appears in conflict with measures in the Plan that may be infeasible or impracticable to implement given site-specific biological characteristics, standards in the renewable energy industry and generally best practices for preservation and mitigation that should be tailored to site-specific constraints and opportunities. The final location of the San Andreas SEA boundaries may impact the feasibility of some renewable energy projects and, therefore, the environmental costs and benefits should be studied against the status of quality resources on site and potentially the significant benefits of a

Ms. Connie Chung  
Los Angeles County  
Department of Regional Planning  
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Page 5

proposed renewable energy alternative before analyzing the environmental benefits of the proposed protocol and delineating the exact boundaries.

### CONCLUSION

The Town and Country Plan includes policies and goals to encourage renewable energy development and complementary polices designed to protect sensitive and general biological resources within the Antelope Valley. These are both noble goals and the County should strive to serve both goals to the maximum extent feasible. To that end, the EIR should study the environmental costs and benefits associated with the proposed San Andreas SEA boundaries to ensure that proper balance is found.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Alfred Fraijo Jr.', with a horizontal line extending to the right.

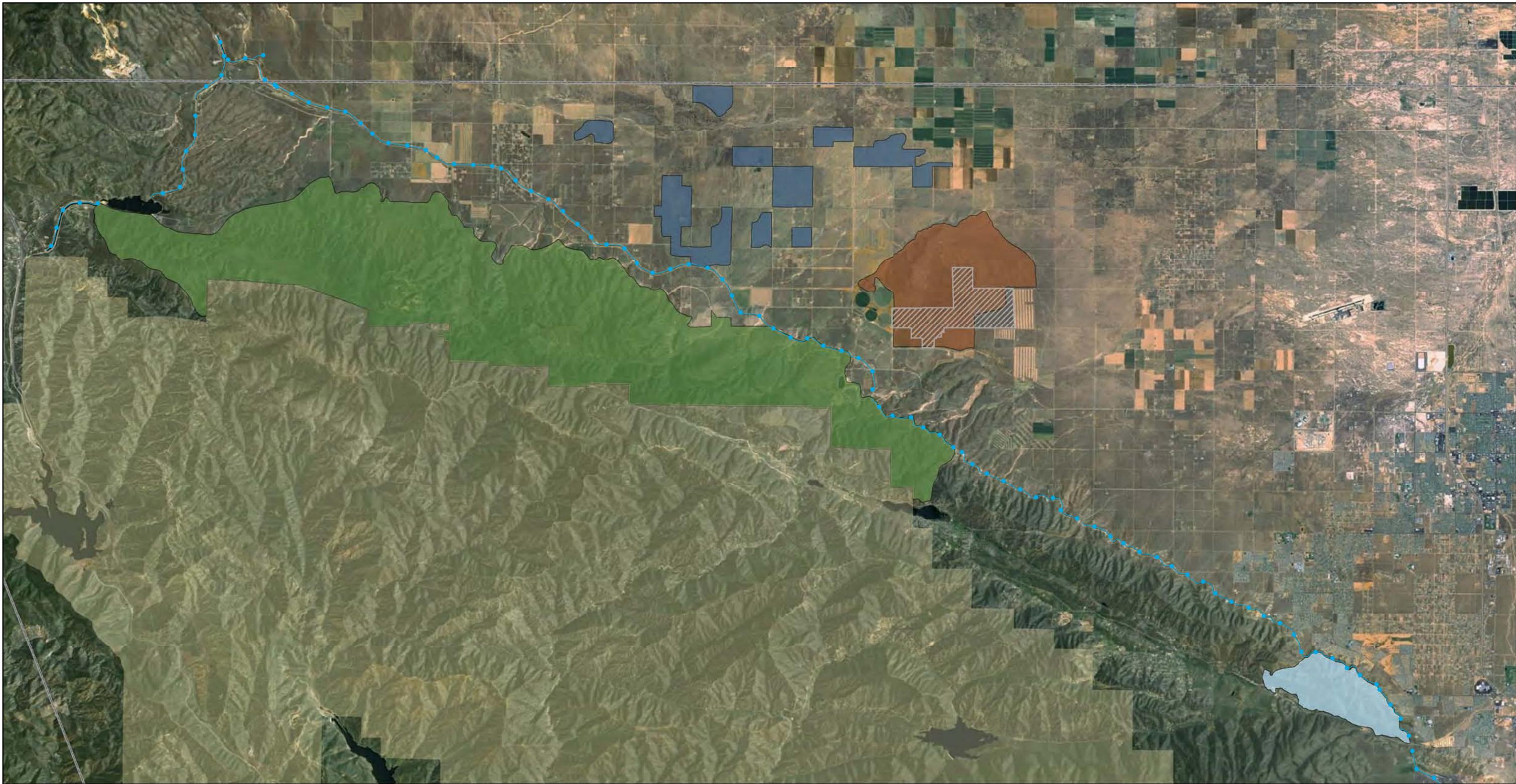
Alfred Fraijo Jr.

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

W02-WEST:1ALF1\403933265.2

Attachments: Exhibits 1 – 5

References: Penrod, KC, C Cabanero, C Luke, P Beier, W Spencer, and E Rubin. 2003. South Coast Missing Linkages: A Design for the Tehachapi Connection. Unpublished report. South Coast Wildlands Project, Monrovia, CA. [www.scwildlands.org](http://www.scwildlands.org). URS. 2009. Biota Report for the AV Solar Ranch One Project; Antelope Valley, California. Prepared for AV Solar Ranch 1, LLC. 353 Sacramento St, Suite 2100, San Francisco, CA 94111.



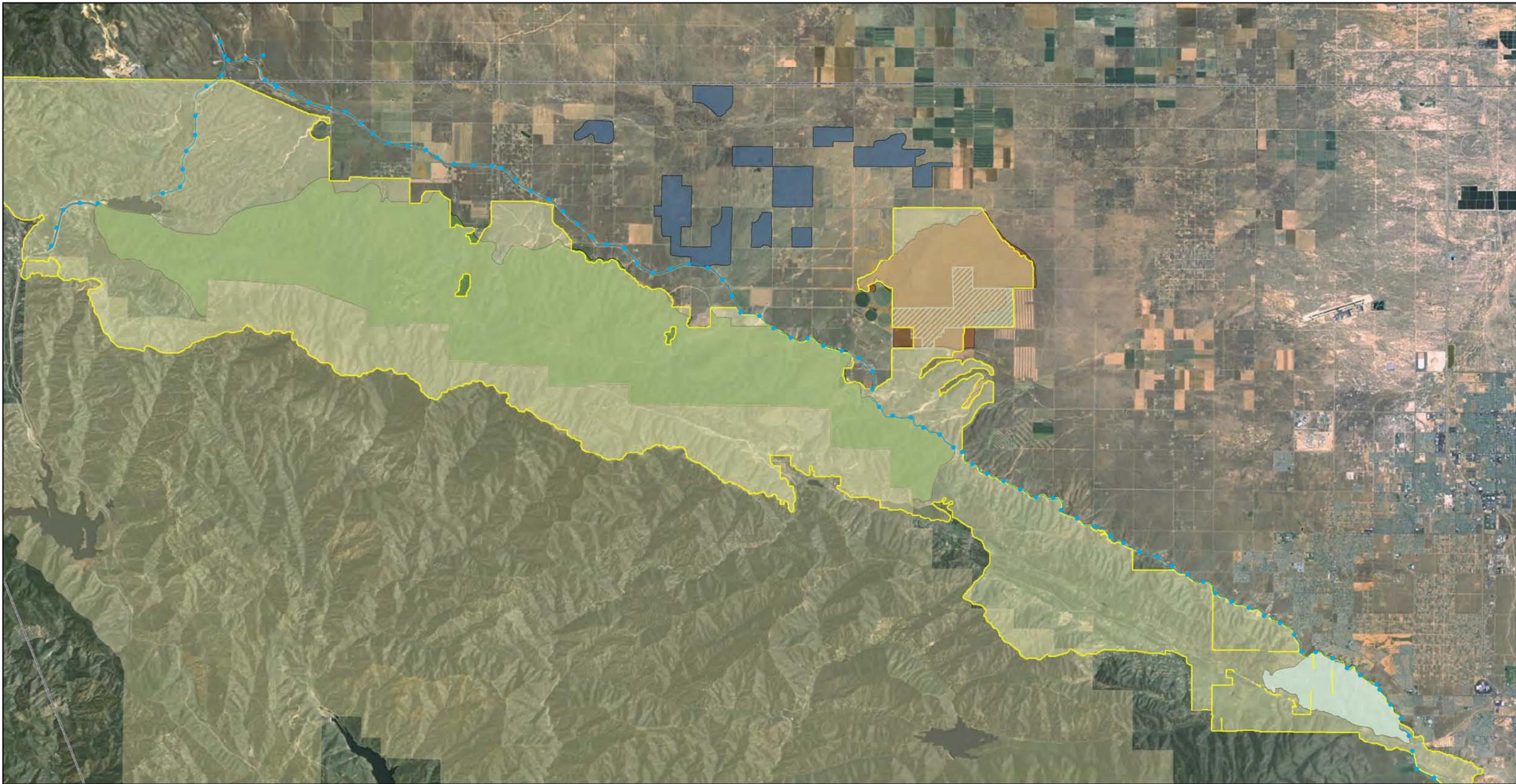
Natural Resource Consultants, 12 September 2011. S:\Element\_Power\Wildlower\_Green\_Energy\_Farm\05\_GIS\_Data\maps\workspace\Biota Report Graphics\SEA Compatibility\Ex 01\_Current SEAs\_NRC01\_20110912.mxd

-  California Aqueduct
-  County Boundaries
-  Angeles National Forest
-  Antelope Valley California Poppy Reserve SNR
-  Fairmont-Antelope Buttes SEA No. 57
-  Joshua Tree Woodland SEA No. 60
-  Portal Ridge- Liebre Mountain SEA No. 58
-  Ritter Ridge SEA No. 56



EXHIBIT 1: EXISTING SIGNIFICANT ECOLOGICAL AREAS  
 TOWN AND COUNTRY PLAN | LOS ANGELES COUNTY, CALIFORNIA





Natural Resource Consultants. 12 September 2011. S:\Element\_Power\Wildflower\_Green\_Energy\_Farm\05\_GIS\_Data\maps\workspace\Biota Report Graphics\SEA Compatibility\Ex 02\_ProposedSEAs\_NRC01\_20110912.mxd

- California Aqueduct
- ▭ County Boundaries
- ▭ Angeles National Forest
- ▨ Antelope Valley California Poppy Reserve SNR
- ▭ Fairmont-Antelope Buttes SEA No. 57
- ▭ Joshua Tree Woodland SEA No. 60
- ▭ Portal Ridge- Liebre Mountain SEA No. 58
- ▭ Ritter Ridge SEA No. 56
- ▭ San Andreas Rift SEA (proposed)

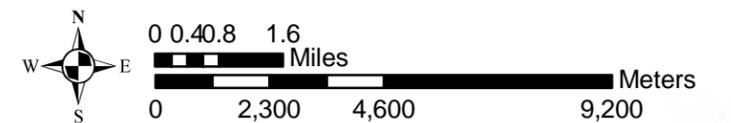
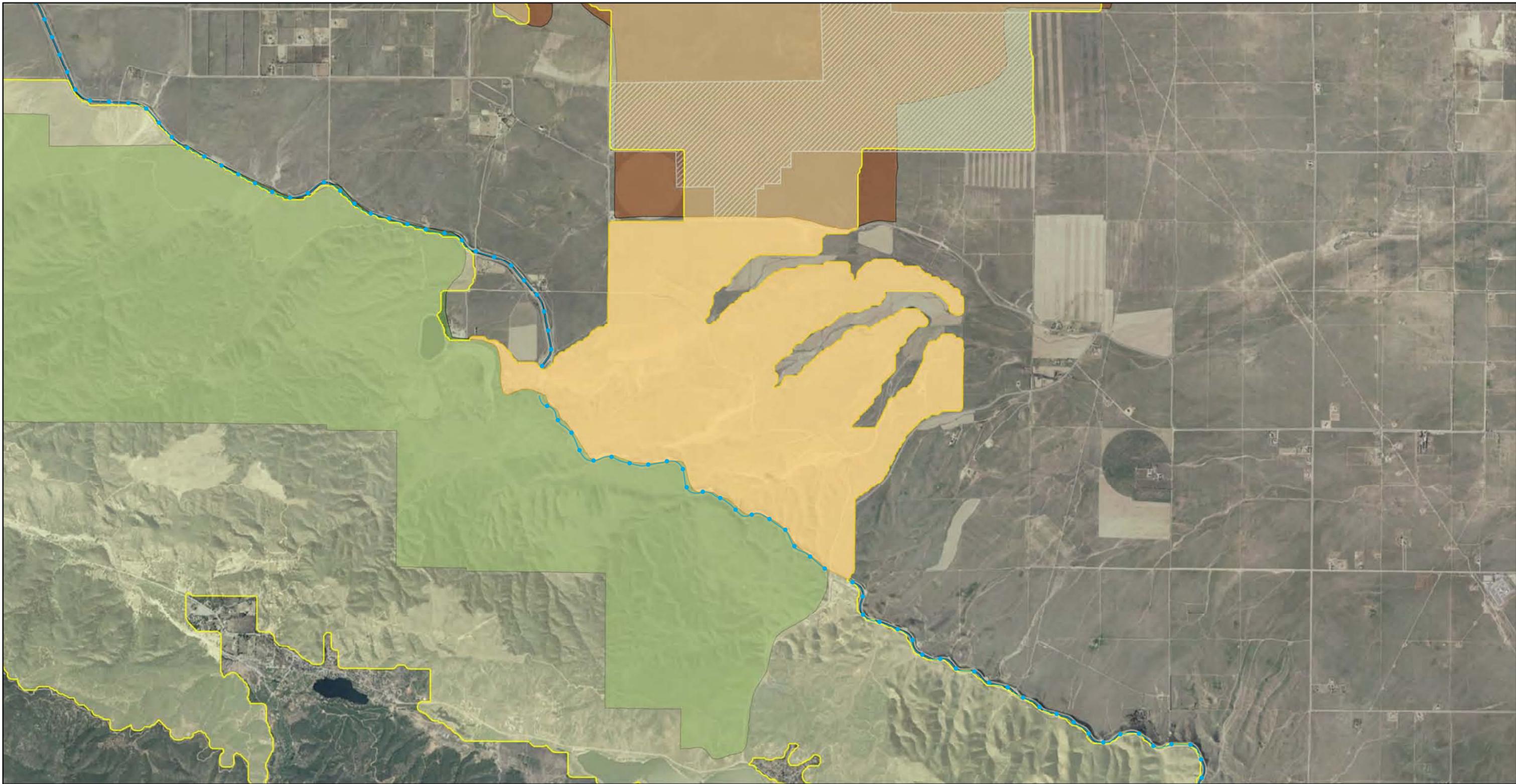


EXHIBIT 2: PROPOSED SIGNIFICANT ECOLOGICAL AREAS  
TOWN AND COUNTRY PLAN | LOS ANGELES COUNTY, CALIFORNIA





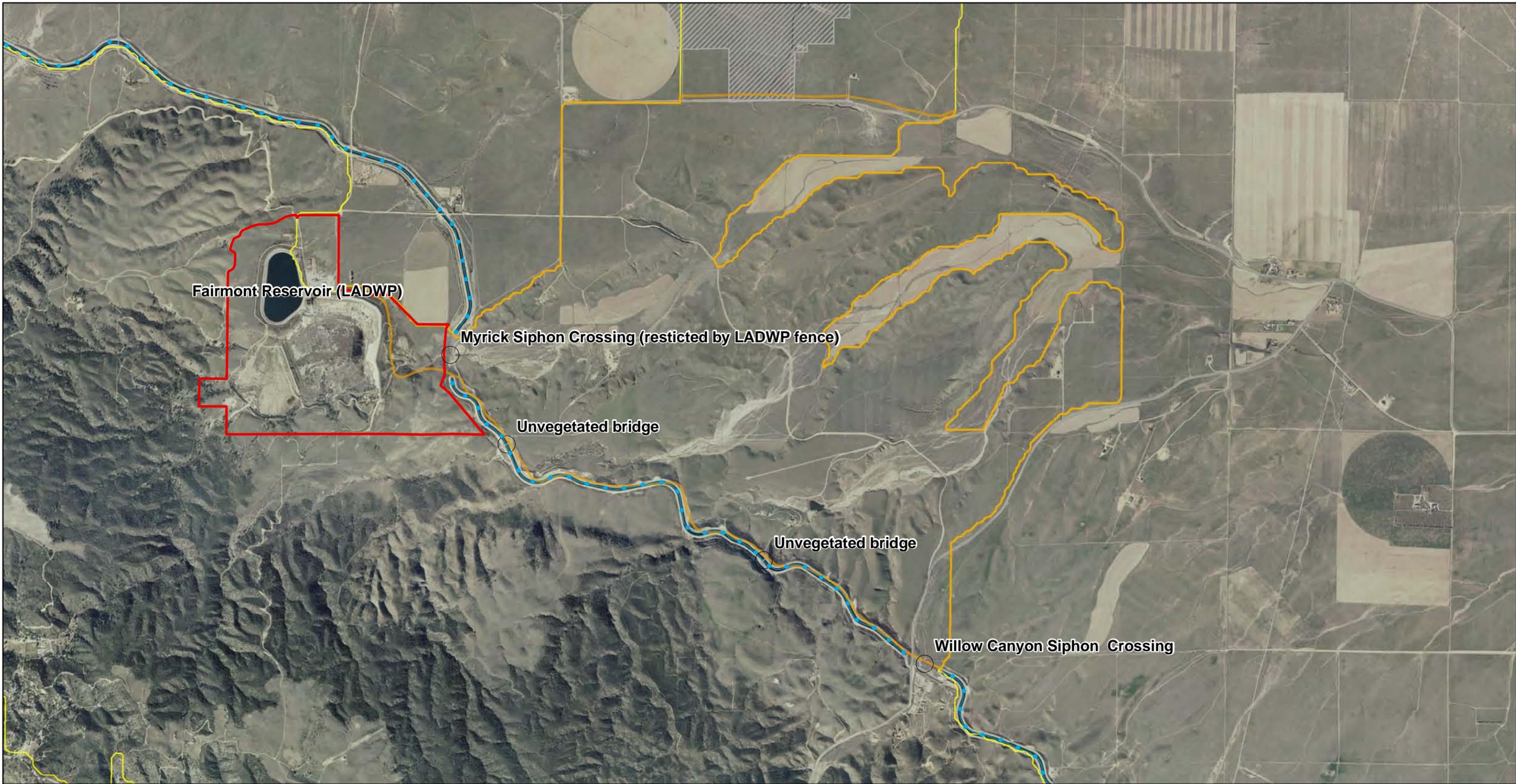
Natural Resource Consultants, 12 September 2011, S:\Element\_Power\Wildflower\_Green\_Energy\_Farm\GIS\_Data\maps\workspace\Biola Report Graphics\SEA Compatibility\Ex 02\_ProposedSEAs\_NRC01\_20110912.mxd

-  California Aqueduct
-  San Andreas Rift SEA (proposed)
-  Linkage Area
-  Antelope Valley California Poppy Reserve SNR
-  Fairmont-Antelope Buttes SEA No. 57
-  Joshua Tree Woodland SEA No. 60
-  Portal Ridge- Liebre Mountain SEA No. 58
-  Ritter Ridge SEA No. 56



EXHIBIT 3: PROPOSED LINKAGE AREA  
 TOWN AND COUNTRY PLAN | LOS ANGELES COUNTY, CALIFORNIA





Natural Resource Consultants, 12 September 2011, S:\Element\_Power\Wildflower\_Green\_Energy\_Farm\GIS\_Data\maps\workspace\Biota Report Graphics\SEA Compatibility\Ex 04\_Aqueduct\Kings\_NRC01\_20110912.mxd

- California Aqueduct
- San Andreas Rift SEA (proposed)
- Linkage Area
- Seven Foot LADWP fencing
- Potential California Aqueduct Crossings

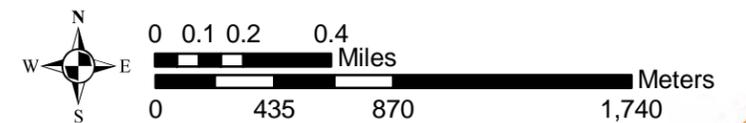


EXHIBIT 4: CALIFORNIA AQUEDUCT CROSSINGS  
TOWN AND COUNTRY PLAN | LOS ANGELES COUNTY, CALIFORNIA





PHOTO 1:

POTENTIAL WILDLIFE CROSSING OVER THE CALIFORNIA AQUEDUCT WITHIN THE PROPOSED SAN ANDREAS SEA. NOTE THE ROW FENCING AND STEEP TERRAIN THAT, ALONG WITH THE AQUEDUCT, ITSELF, PRESENT FORMIDABLE BARRIERS TO WILDLIFE MOVEMENT.

PHOTO 2:

THE CALIFORNIA AQUEDUCT AND ASSOCIATED ROW FENCING WITHIN THE PROPOSED SAN ANDREAS SEA. THIS FEATURE GREATLY REDUCES WILDLIFE MOVEMENT IN THE PROPOSED LINKAGE AREA BETWEEN SEAS 57 AND 58.



PHOTO 3:

SECURITY FENCING (FOREGROUND) AND LADWP FENCING (BACKGROUND) AT MYRICK SIPHON. THESE SEVEN-FOOT TALL BARBED WIRE FENCES REDUCE THE EFFECTIVENESS OF THIS VEGETATED CROSSING FOR WILDLIFE MOVEMENT.



PHOTO 4:

VIEW LOOKING SOUTH AT MYRICK SIPHON. NOTE THE CALIFORNIA AQUEDUCT ROW FENCING (TOP LEFT) INTERSECTING WITH THE LADWP FENCING (TOP RIGHT), CREATING A FORMIDABLE BARRIER TO WILDLIFE MOVEMENT AT THIS CROSSING.



September 9, 2011

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Ms. Hua:

I am hereby responding to the above stated Notice of Preparation (NOP). I am opposed to exclusively utilizing the proposed goals, policies, implementing programs, land use designations (density and intensity) in the Draft Antelope Valley Area Plan: Town & Country (Draft Plan) for the Environmental Impact Report (EIR) study. The Draft Plan is currently under active review by the community, and has not yet been fully vetted for use in an EIR. Accordingly, I am requesting the EIR study include the range of land use designations associated with the current Land Use Plan and the Draft Plan.

Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, I have a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The downzoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. In 2010 the median home sales price in the high desert was \$125,550 and was the most affordable housing region in the State, during a time when the County median sales price was \$346,840. The downzoning resulting from the proposals found in the Draft Plan must result in an upzoning in other, less-affordable areas, as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County will be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented.

Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

Government agencies implementing SB 375 should not regard development, or the prohibitions of development, as the sole solutions for meeting their Greenhouse Gas (GHG) emission reduction target. Housing affordability, construction costs and other economic impacts must be considered when evaluating measures proposed for meeting the goals of SB 375.

As stated in the Notice,

“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of my request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, I request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,

Dave Slover  
President Elect of the Greater Antelope Valley Association of REALTORS

September 13, 2011

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

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Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, I have a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The downzoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. In 2010 the median home sales price in the high desert was \$125,550 and was the most affordable housing region in the State, during a time when the County median sales price was \$346,840. The downzoning resulting from the proposals found in the Draft Plan must result in an upzoning in other, less-affordable areas, as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County will be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented.

Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

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This is the foundation of my request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, I request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,

s/Steve Rice

Steven Rice, Realtor®  
43912 20<sup>th</sup> St W  
Lancaster, CA 93534  
[steve.rice@coldwellbanker.com](mailto:steve.rice@coldwellbanker.com)  
661-305-0561



September 14, 2011

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

**Re: Initial Comments - Los Angeles County Draft General Plan Update 2035  
and Notice of Preparation of Draft Environmental Impact Report**

Dear Connie:

On behalf of the members and representative employees who make up the Building Industry Association of Southern California, Inc., Los Angeles Ventura Chapter (BIASC/LAV), thank you for the opportunity to comment on the proposed Draft General Plan (Plan) and the Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR).

Upon initial review of the Plan, we immediately note a very substantial shift in the type and location of future housing for the unincorporated Los Angeles County. We believe that the Plan should better reflect policies that will allow a range of housing options, including affordable housing, while adequately housing the growing population. A reasonable amount of that growth will, we believe, inevitably need to unfold in the north Los Angeles area. Hence, we recommend that the County carefully consider its density projections and especially the Housing Element to sufficiently assure that the housing needs for the future of Los Angeles County will be met.

In particular, major down-zoning is being proposed for north Los Angeles County. Additional information should be provided in the Plan to better explain what prospective changes are anticipated and where shifts in density are tentatively prescribed, both down-zoning of areas and up-zoning of other areas.

To help illuminate the true nature of the proposed changes, the Plan should provide maps and tables in an Appendix which indicate and locate current zoning densities, the proposed new densities, and the respective extents of up-zoning or down-zoning. This information should be made available early in the process to enable land owners and residents to understand the County's vision of the future as well as overall implications to individual parcels. Insertion of maps and tables will aid all land owners, residents and stakeholders in understanding the

proposed changes and the effect the changes could have on their land. The effort to preserve open space, farmland, biological resources, natural habitats, etc. should all be clearly identified on the maps to show current and proposed changes, and – in a separate map – the differences.

Table 2.5 of the Plan identifies a 147% increase in population in the Antelope Valley, a 99% increase in population in Santa Clarita Valley and an overall 39% population increase in Unincorporated Los Angeles County by 2035. Household projections are expected to increase by 148%, 95% and 43%, respectively. Where will this population live – and at what cost of construction? The down-zoning proposals in the Plan indicate less housing opportunities in unincorporated Los Angeles County. Where will affordable housing be located in unincorporated areas? Table C.2 in Appendix B provides the estimated population density that is 20% less than what is projected in Table 2.5. Further study of population should be provided to ensure adequate housing, affordable housing and employment opportunities are provided throughout the county.

With the proposed changes in future density and the drive to move people into more urban areas, it is also important to include maps and tables that highlight where the areas of up-zoning will occur as well as address how the up-zoning will impact traffic, aging and inadequate sized infrastructure for the increased population.

County planners should also be aware that major land use changes could have significant impact on future financing. As credit becomes more and more difficult to obtain, the major down-zoning and up-zoning throughout the county could make it significantly more complicated to obtain financing for construction and development when zoning and use designations are not in compliance with actual development. Standard loans could shift into non-conforming categories, making it more costly and difficult to obtain credit and complete real estate transactions.

The downzoning changes proposed reference a desire for the general plan to preserve environmentally sensitive and hazardous areas. More detailed analysis should be provided to highlight the current Significant Ecological Areas (SEA) to highlight how they are impacted under the current general plan vs. the Plan. Boundary maps should be shown to compare the current and proposed areas and the effects on land use. The same analysis on current general plan vs. Plan should be completed on the Very High Fire Hazard Severity Zone (FHSZ) Policy and map as it relates to justification for density reductions in rural unincorporated areas. Additional mapping should be completed to also highlight the difference between the Cal Fire FHSZ and that proposed by Los Angeles County. The last official Cal Fire FHSZ Map was approved by the State in 1995. Cal Fire is currently drafting a new FHSZ, which proposes significant changes and boundaries as well as new zones. Ideally, both maps should be in line, but in some circumstances they are not and will not be as the local agency has a better understanding of local land use and available infrastructure. However, given that these maps are used significantly for land development, insurance and financing, clear understanding of the boundaries and differences should be identified and referenced in the Plan and DEIR as appropriate.



September 14, 2011  
Ms. Connie Chung  
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Again the drastic density changes in the Plan cannot be adequately analyzed without also updating the Housing Element. The Plan is currently proposing to update nine of the 10 elements of the general plan. The Housing Element is not proposed at this time. It is our understanding that the Department of Regional Planning will update the Housing Element after Southern California Association of Governments (SCAG) releases the Regional Housing Needs Analysis (RHNA) numbers in October 2012 and that once the RHNA numbers are available and after completion of the EIR and General Plan Update, the County will begin working on the Housing Element. Since the current RHNA numbers are good until 2014, and given the significant impacts (traffic, infrastructure, housing costs, etc.) on increasing densities in urban areas, it is important to also update the Housing Element in conjunction with the General Plan Update. The Plan should identify how much is left to build to the 2014 plan. How many units have been built compared to the projections in RHNA, and the current general plan projections. The significant density shifts should be adequate and comply with RHNA.

The Plan identifies several Opportunity Areas where commercial development is encouraged to promote jobs. Figures 2.8 through Figures 2.18 identify several Opportunity Areas with promotion of Rural Town Centers. These same areas are where the major density reduction proposals are sought. An economic impact report of the Opportunity Areas should be completed to evaluate the density reduction proposals in the Plan. How will commercial and retail areas thrive without the needed residential to support the business economy? How will the County retain and attract business without the necessary rooftops to support the businesses? An in-depth economic impact analysis should help ensure that businesses can be supported and that job creation objectives can be met with the proposed reduced densities in rural Los Angeles County.

To supplement the economic impact analysis, a Fiscal Impact Analysis should also be completed that highlights current fiscal impacts as well as proposed. The analysis should focus on affordable housing and where affordable housing will be located. The proposed higher-density, multi-family development is extremely costly to build and therefore would need to be sold at a much higher prices than comparable single family homes. What will an average new home cost the average person to buy or rent? What are the projected incomes of the average resident of Los Angeles County?

The DEIR is slated to address both short and long term effects of the general plan alternatives. Therefore, an evaluation should also be completed to assess the current general plan, short and long term, to review the extent to which the current general plan is most beneficial to the region.

In addition to addressing density and the Housing Element, the Plan and DEIR should also be consistent with other related plans and the spirit of SB 375.

While preparing the Santa Clarita Area Plan, One Valley One Vision (OVOV), County planners worked directly with the City of Santa Clarita to ensure mutual goals and objectives were met. Has the same occurred with the City of Palmdale and Lancaster and local utilities? Do the local city general plans and zoning requirements, as well as existing and planned infrastructure accommodate the increased growth outlined in the Plan? Full analysis of the density proposals should be completed to accommodate for the future housing needs both in the unincorporated county area as well as the neighboring cities and communities that will accommodate the increased densities. This would include impacted areas in the entire Los Angeles basin including the communities in the Antelope Valley. Street and roadway plans, sewer plans, water procurement, etc. in all jurisdictions where up-zoning is proposed should be reflect the proposals of the Plan.

How does the Plan provide consistency with SB 375? What CEQA streamlining measures will be available? Has enough analysis been completed to ensure there is no conflict with local area plans? Can the communities and neighborhoods accommodate the added densities proposed? Do impacted cities have adequate infrastructure to accommodate growth?

The Plan, in essence, seeks to eliminate lateral urban expansion, which – at its worst – is called sprawl. But the policies proposed would necessarily implicate a great many individual project proposals which are presently foreseeable and worthy of approval. Policy LU 1.5 – in particular – is a very concerning policy, as it purports to prohibit project-specific amendments and eliminate expanded capacity of the roadway network for future growth. BIASC/LAV suspects that such a provision would not pass legal muster, given that the Supervisors may not tie their own hands in such a manner. Apart from this, the policy would preclude new residential proposals which could in fact be directly adjacent to current approved parcel or tract maps that are yet to be built. Increased residential densities in these circumstances would not be urban sprawl, but traditional growth in a region. Road expansions and improvements in urban areas are always welcomed and almost always warranted for new residential or commercial developments and often aid in the reduction of congestion and improve existing conditions. County should look for all so-called “Smart Growth” opportunities and encourage wherever possible and avoid policies that make good development an expensive and complicated undertaking.

This additional analysis will enable us to better understand the need for the dramatic density reductions in the rural areas.

The 2035 General Plan and Area Plans should also provide much-needed flexibility. No one can predict the future and a means to address future changes should be provided without under-going needless hurdles by “Applicants”. We are concerned with Policy LU1.2 of the Plan, that “discourages project-specific amendments to the text of the General Plan...” and the Land Use



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Policies that could make needed General Plan Amendments complex, time-consuming and costly should they be deemed out of compliance with the Goals and Policies of the General Plan.

In the Plan and the Santa Clarita Valley Area Plan update (OVOV), the plan and zone lines correspond with the GIS-delineated parcel and roadway lines allowing for increased accuracy. However, there are instances in which this increased accuracy could have unintended consequences causing unnecessary administrative difficulties that could require plan amendments/zone changes. The Plan should provide flexibility in such instances so that amending these newly adopted plans would not be necessary. Both the existing general plan and the Santa Clarita Valley Area Plan provide provisions for plan line delineation that allow flexibility, which appears to have been eliminated from the updated plans.

Examples of why the Plan should provide flexibility follow, and would be useful for both applicants and the County when land use designation boundaries encroach into projects (for example; by 5 feet, 20 feet, 100 feet or more).

1. In the Plan and OVOV, there are instances where proposed land use designations follow a proposed highway alignment. However, upon final IEC approval, the roadway alignment may not match that of the proposed highway alignment indicated in the updated plans.
2. If a road is realigned for some reason (e.g., to save an oak tree) and the resulting bisected property has two land use designations, that may make the proposed project inconsistent with the newly adopted land use and zoning designations.
3. A future subdivision of land, or other proposed project, may cross two or more parcels (held under single ownership) with different land use designations. In the event that a project is proposed across two parcels with different land use designations that otherwise meet the criteria for each of the designations, the boundary of the land use designation should be able to be adjusted to follow final parcel lines without a plan amendment.
4. Lot line adjustments between parcels with different land use designations should have a mechanism to adjust the final land use designations without a plan amendment.

In the absence of such flexibility, the County would be complicating a variety of otherwise relatively straightforward development projects, including new projects, redevelopment projects, and Transit Oriented Development projects.

Solutions that would allow for flexibility or substantial conformance procedures that could allow the County, at an administrative level, to adjust boundaries without a formal plan amendment are presented below. BIASC/LAV respectfully urges that they be included in the DEIR among the alternatives and, preferably, with primacy therein.

1. Include similar language that is in the existing Santa Clarita Valley Area Plan.
2. Allow for a process similar to that of the City of Los Angeles' Zone Boundary Adjustment process.

*Individual Adjustments: The Director may, upon written request and after notice and hearing to the owners of the property affected by the proposed decision, make minor adjustments in the locations of zone boundaries to carry put the intent of this section when:*

1. Include a Substantial Conformance determination process similar to the process outlined in the adopted Newhall Ranch Specific Plan (section 5.2)

The solution may also be a combination of any of these measures.

Of final note, the NOP for the DEIR notes it will address potential ordinance updates, changes and additions. Some portions of the draft Plan also reference ordinance language (Quimby Act for example). An overview of current vs. proposed policy should be identified for ease in understanding what is new, what has been changed or modified and what remains the same within the ordinances and which ordinances, polices and manuals have been rescinded.

Sprawl has been identified as a key issue within the Plan. Sprawl apparently contributes to traffic congestion as there are no transit options, yet no TOD has been identified in the unincorporated north Los Angeles County area in the Draft General Plan TOD Policy Map. How will the County encourage infill and higher densities in these areas without TODs?

BIASC/LAV would also like to request the staff consider inclusion on analysis for future speculative developments. Our membership has been asked by Leading Agencies to incorporate analysis in the ir project EIRs for such projects including analysis of High Speed Rail (In Antelope Valley or the I-5 Corridor) and the effects on traffic reduction; the proposed Palmdale Regional Airport and potential effects on air space with increased densities; as well as the future High Dessert Corridor and impacts on the rural communities.

With the significant amount of work that has been presented in the draft Plan and Antelope Valley Area Plan, the BIA would like to request additional time to continue review of the plans and provide comment. We are currently meeting with Department of Regional Planning staff to



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have detailed informational discussions on selected elements of the Draft General Plan. It would be appreciated if we could continue to meet with staff and provide further comment at a later date.

Given the substantial amount of evaluation and analysis that remains to be completed within the Draft General Plan, the BIA would like to request that the County complete and provide the additional studies and update the Draft for continued public review and comment.

Thank you again for allowing the Building Industry Association of Southern California, Los Angeles/Ventura Chapter to provide initial comments. We look forward to working with you further on this extensive undertaking.

Sincerely,

*Holly Schroeder*

Holly Schroeder  
Chief Executive Officer

C: Mr. Richard Bruckner, Los Angeles County Director of Planning and Development  
Ms. Thuy Hua, Los Angeles County Dept. of Regional Planning Sr. Regional Planner  
Sandy Sanchez, BIASC/LAV Director of Government Affairs  
Marta Golding Brown, BIASC/LAV Antelope Valley Director



September 9, 2011

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 Temple Street Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Ms. Hua:

The Building Industry Association Los Angeles/Ventura Chapter (BIA) is hereby responding to the above stated Notice of Preparation. We are opposed to exclusively utilizing the proposed goals, policies, implementing programs and land use designations (density and intensity) the Draft Antelope Valley Area Plan: Town & Country (Draft Plan) as the basis for the draft Environmental Impact Report (EIR) study. The Draft Plan is currently under active review by the community, and has not yet been fully vetted for use in an EIR. Accordingly, we request that the EIR study include the range of land use designations associated with the current Land Use Plan and the Draft Plan.

Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, the BIA has a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The downzoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. This downzoning must result in an upzoning in other, less-affordable areas as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account

NOP EIR Scoping: AV Plan Response

Thuy Hua

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for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County will be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented. Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

Government agencies implementing SB 375 should not regard development, or the prohibitions of development, as the sole solutions for meeting their Greenhouse Gas (GHG) emission reduction target. Housing affordability, construction costs and other economic impacts must be considered when evaluating measures proposed for meeting the goals of SB 375.

As stated in the Notice,

“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of the BIA request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, we request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,



Marta Golding Brown

Antelope Valley Director

Los Angeles/Ventura Chapter

# *AV Area Plan Blue Ribbon Committee*

September 13, 2011

## *Committee Members*

Havey Holloway, Co-Chair

James D. Vose, Co-Chair

Wayne Argo

Karen Bryan

John Calandri

Jackie Fisher

Forrest McElroy

Greg Medeiros

Regina Rossal

Betty Smith

Craig Van Dam

Johnny Zamrzla

## *Elected Officials*

Senator

Sharon Runner

Assemblyman

Steve Knight

## *Associations*

BIA - Building Industry  
Association  
Los Angeles Ventura  
Chapter

Greater Antelope  
Valley Association of  
REALTORS®

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 Temple Street Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report & Notice of Public Scoping Meetings

Dear Ms. Hua:

The Antelope Valley Blue Ribbon Committee, appointed by Supervisor Antonovich to review the Draft Antelope Valley Area Plan: Town & Country (Draft Plan) is hereby responding to the above stated Notice of Preparation. As a group we oppose exclusively utilizing the proposed goals, policies, implementing programs and land use designations (density and intensity) in the Draft Plan as the basis for the draft Environmental Impact Report (EIR) study. The Draft Plan is currently under active review by the Committee and community, and has not yet been fully vetted for use in an EIR. Accordingly, the Committee requests that the EIR study include the range of land use designations associated with the current Land Use Plan and the Draft Plan.

Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, the Committee has a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The downzoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. This downzoning must result in an upzoning in other, less-affordable areas as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County will be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented. Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

Government agencies implementing SB 375 should not regard development, or the prohibitions of development, as the sole solutions for meeting their Greenhouse Gas (GHG) emission reduction target. Housing affordability, construction costs and other economic impacts must be considered when evaluating measures proposed for meeting the goals of SB 375.

As stated in the Notice,

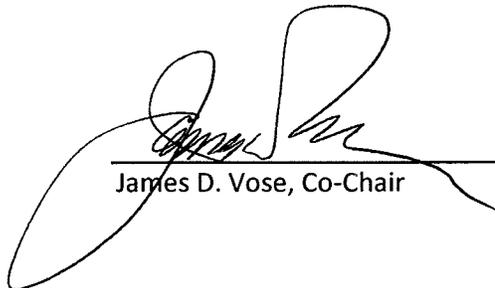
“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of the Committee’s request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, the Committee requests the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,

  
\_\_\_\_\_  
Harvey Holloway, Co-Chair

  
\_\_\_\_\_  
James D. Vose, Co-Chair

CC: Supervisor Michael Antonovich  
Senator Sharon Runner  
Assemblyman Steve Knight  
Assemblyman Jeff Gorell  
Mitch Glazer



*Los Angeles County Farm Bureau*

41228 12<sup>th</sup> Street West, Suite A ☎ Palmdale, CA 93551

Telephone 661.274.9709 ☎ Fax 661.274.0637

www.lacfb.org

September 13, 2011

SEP 19 2011

Ms. Thuy Hua  
Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, 13<sup>th</sup> Floor  
Los Angeles, CA 90012

**Subject: Proposed Antelope Valley Area Plan or “Town & Country Plan”**

Dear Ms. Hua:

Thank you for confirming your attendance to discuss the proposed Area Plan at our regularly scheduled Board of Directors meeting on September 22<sup>nd</sup>. In response to your request in your email dated July 28, 2011, below is a list of questions we desire to discuss.

**Value and Importance of Rural and Agricultural Lifestyle**

Farmers and ranchers clearly understand and promote a rural lifestyle. Most agricultural property owners in the Antelope Valley historically have maintained their property as a whole rather than subdividing into smaller parcels. As you probably know, huge areas of the Antelope Valley have been already subdivided into 2 ½ acre parcels. However, numerous conflicts and inequities exist in the proposed Area Plan.

**Question 1: Why has this Area Plan been proposed at this time. Is there any relation between this Plan and the on-going groundwater adjudication?**

**Question 2: Who are the parties who are promoting this Plan? Since this Plan promotes the agricultural lifestyle, why did the Department of Regional Planning not include the Los Angeles County Farm Bureau in all stages of preparation?**

### **Proposed Prohibition on Development**

The proposed restriction regarding the number of dwelling units allowed per parcel appears to be impractical, unworkable and prejudicial for a variety of reasons. As mentioned above, most of the Valley has been subdivided into 2 ½-acre parcels and restricting one dwelling unit per 20 acres, for example, is unjust. For security, communication and other concerns, farms and ranches have historically clustered together many of their residential dwellings in one parcel.

Because of the groundwater adjudication, most farmers are concerned that water will not be available or too expensive for farming in Antelope Valley. Many desire to maintain their farming lifestyle for their family and future generations. This goal has recently become more difficult because large acreages of agricultural land have been sold to renewable energy firms. To accomplish this goal of preserving farming for their family, farmers must be able to sell their property at a fair price to afford to move elsewhere where water is available and affordable. The Area Plan decimates the value of property in the unincorporated area of the Valley because of the limitation on dwelling units per acre. Also, many farmers have worked their entire lives with the expectation of selling their property to have enough financial resources to retire, pay “death taxes,” pay off debts, etc. To remove this opportunity which folks have planned for and enjoyed in perpetuity is unjust.

Banks consider the net worth of farmers, ranchers and other property owners when making loans. The Area Plan will significantly devalue all property in the unincorporated areas of Los Angeles County thereby putting a sudden financial hit on these property owners.

Does the Area Plan treat a large parcel which is surrounded by 2 ½ acre parcels differently than a large parcel which is **not** surrounded by 2 ½ acre parcels? Does the Area Plan treat 2 ½ acre parcels differently than a neighboring parcel which is larger than 2 ½ acres? Are you aware that the parcels in the vicinity of Avenue A, the Los Angeles/Kern County boundary line, are treated one way in Kern County and severely limited a few feet away in Los Angeles County? Are you aware that the same applies to those agricultural parcels adjacent to the City of Lancaster and the City of Palmdale?

**Question 3: Does this new Area Plan force farmers and ranchers to disperse their dwelling units throughout their property regardless of the needs of the operation?**

**Question 4: Does this new Area Plan intentionally remove the opportunity for farmers and ranchers and their families to sell their property for a fair price to retire, pay taxes, etc.?**

**Question 5: If farming becomes impossible in Antelope Valley because of the groundwater adjudication or other factors, does this new Area Plan remove the opportunity for farmers and ranchers to sell their land for a fair price and move their farming practices elsewhere?**

**Question 6: The Area Plan will devalue the land in the unincorporated areas of Antelope Valley. What have you done to consider the financial impacts to all the landowners?**

**Question 7: Did you consider the inconsistencies of the Area Plan with the plans of the neighboring properties in Kern County, City of Lancaster, City of Palmdale, etc.?**

**Effect of Los Angeles County Waterworks No. 40 Litigation Strategy in the Current Groundwater Adjudication**

In the ongoing groundwater adjudication, Los Angeles County Waterworks No. 40 is trying to convince the Court to eliminate 100,000 acre-feet per year, or about 45% of the potable water that is available to the Antelope Valley today and reduce the groundwater pumping for the general community to 43% of present levels. These reductions are not necessary but are concocted and fabricated by Los Angeles County No. 40 and other water purveyor technical experts.

No one knows if replacement water to make-up for these reductions will ever be available. If this make-up water is available, some estimate the cost of water for residences and other uses may sky-rocket about 20 times based on the current cost of "Table A water."

Obviously, if Los Angeles County Waterworks No. 40 is successful in this litigation, they will decimate the current rural lifestyle and agriculture in Antelope Valley will be destroyed and prevented from existing in the future. Farming will no longer have the water or be able to afford the water to exist in Antelope Valley. The single-family residents and mutual water companies will no longer have affordable water to maintain their rural lifestyle.

**Question 8: How does the Area Plan cope with Waterworks eliminating 45% or 100,000 acre-feet per year of potable water in Antelope Valley.**

**Question 9: How does the Area Plan deal with the fact that water costs may increase 20-fold and become unaffordable to the rural community?**

**Impracticality of “Dry Farming” in Antelope Valley.**

The Area Plan suggests that agriculture should shift towards “dry farming.” The recommendation is not feasible because “dry farming” has only been successful in select areas of the Valley in the vicinity of mountains. Today only a few dry farming operations exist because of the lack of dependable rainfall.

**Question 10: Please describe the research that was done to suggest the possibility of “dry farming”**

**Remedy to Remove Inequities in the Area Plan or “Town & Country Plan”**

Some of the inequities and impossibilities of the Plan in maintaining the rural and agricultural lifestyle are discussed above. The possibility of promoting these lifestyles can be attained without decimating the overall economic condition of Antelope Valley and ruining agriculture. Perhaps an analysis should be done of other areas within and without California that have the same goals. Also, all parties with an interest in this important issue should be involved in the process.

Thank you for taking the time to talk to me over the telephone on several occasions and to our Board on the 22<sup>nd</sup>. We look forward to having a productive and thoughtful discussion.

Sincerely,



Eugene B. Nebeker, Ph.D., P.E.  
President

cc: Micheal D. Antonovich, Los Angeles County Mayor  
Kathryn Barger - Liebrich, Chief of Staff, Supervisor Michael Antonovich  
Edel Evizcarra, Planning Deputy  
Norm Hickling, Deputy

Richard J. Bruckner, Director of Los Angeles County Department of Regional Planning  
Dennis Slavin, Chief Deputy Director  
Jon Sanabria, Deputy Director  
Mitch Glaser, Section Head, Community Studies and Air Quality  
Connie Chung, Section Head, General Plan Development



# Greater Antelope Valley Association of REALTORS®

1112 West Avenue M-4 • Palmdale, CA 93551 • 661.726.9175 • Fax: 661.726.9199

[www.gavar.org](http://www.gavar.org)

September 9, 2011

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Ms. Hua:

The Greater Antelope Valley Association of REALTORS® (GAVAR) is hereby responding to the above stated Notice of Preparation (NOP). We are opposed to exclusively utilizing the proposed goals, policies, implementing programs, land use designations (density and intensity) in the Draft Antelope Valley Area Plan: Town & Country (Draft Plan) for the Environmental Impact Report (EIR) study. The Draft Plan is currently under active review by the community, and has not yet been fully vetted for use in an EIR. Accordingly, GAVAR is requesting the EIR study include the range of land use designations associated with the current Land Use Plan and the Draft Plan.

Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, GAVAR has a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The downzoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. In 2010 the median home sales price in the high desert was \$125,550 and was the most affordable housing region in the State, during a time when the County median sales price was \$346,840. The downzoning resulting from the proposals found in the Draft Plan must result in an upzoning in other, less-affordable areas, as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County would be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented. Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

Government agencies implementing SB 375 should not regard development, or the prohibitions of development, as the sole solutions for meeting their Greenhouse Gas (GHG) emission reduction target. Housing affordability, construction costs and other economic impacts must be considered when evaluating measures proposed for meeting the goals of SB 375.

As stated in the Notice,

“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of our request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, we request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Venturoli', written over a horizontal line.

Daniel Venturoli, President



September 9, 2011

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

Dear Ms. Chung:

I am writing in regard to the Notice of Preparation (NOP) for the proposed Los Angeles County General Plan (GP) Update. The Cities of Brea, La Habra, La Habra Heights, Whittier, the Hacienda Heights Improvement Association and Rowland Heights Community Coordinating Council share common interests for public education regarding hillside and open space lands and formed the Hillside and Open Space Education Coalition (HOSEC). You can find our website at [www.hosec.com](http://www.hosec.com). HOSEC appreciates the opportunity to provide comments regarding the NOP for your proposed GP Update as provided below:

1. **Land Use** – The County’s EIR should provide a comprehensive discussion and analysis of the compatibility of the proposed General Plan land use designations and goals and policies as compared to HOSEC goals and policies for hillside and open space education and preservation.
2. **Biology** – Los Angeles County lands abutting and nearby the HOSEC member cities and unincorporated L.A. County communities are largely undeveloped and contain a wide variety of biological resources. HOSEC’s principles provide for the conservation and preservation of such resources and these considerations should be comprehensively analyzed within the EIR, considered within land use decisions, and adequate resource protections and land preservation goals and polices provided within the GP Update. Where necessary, mitigation measures should be provided to off-set any remaining potential for impacts within the Puente-Chino Hills area.

September 9, 2011

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Los Angeles County's Significant Ecological Area Technical Advisory Committee (SEATAC) report and comments from prior proposed GP actions for the areas near HOSEC communities as well as the Conservation Biology Institute's July 2005 report for this area (Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor) should be included within research and analysis. Where necessary, mitigation measures should be provided to off-set any remaining potential for impacts.

HOSEC appreciates the opportunity you have provided us regarding input into this project and we look forward to continuing our communication as the process moves forward. Thank you for the opportunity to comment on the NOP. Please send further information to my attention as it becomes available. If you have any questions regarding HOSEC's response, please feel free to reach me at 714-671-4481.

Sincerely,



Eric Nicoll, Community Development Director  
City of Brea, HOSEC Executive Committee Member  
c/o City of Brea  
1 Civic Center Circle, Level 2  
Brea, CA 92821

cc: Bob Henderson, Chairman, HOSEC  
Brett Murdock, Vice Chairman, HOSEC  
HOSEC Steering Committee Members  
HOSEC Executive Committee Members

## Town\_Country

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**From:** Dan Silver [dsilverla@me.com]  
**Sent:** Wednesday, September 14, 2011 4:43 PM  
**To:** Town & Country  
**Subject:** Notice of Preparation for Antelope Valley Area Plan Update EIR

September 14, 2011

*VIA ELECTRONIC MAIL ONLY*

Thuy Hua, AICP  
Department of Regional Planning  
County of Los Angeles

### **RE: Notice of Preparation for Antelope Valley Area Plan Update EIR**

Dear Mr. Hua:

The Endangered Habitats League (EHL), Southern California's only regional conservation organization, respectfully submits the following comments on the Notice of Preparation of an Environmental Impact Report for the draft Antelope Valley Area Plan Update.

EHL is encouraged to note that a rural preservation strategy is a key component of the Updated draft plan. Accomplishing this laudable objective, while at the same time providing for an adequate supply of housing and establishing the basis for economically healthy communities, will be a challenging, yet necessary task if the draft plan is to meet sustainability goals.

Fortunately, there exist several planning tools that can advance these goals, including Urban Growth Boundaries (UGBs), Transferable Development Rights (TDR) programs, Purchase of Development Rights (PDR) programs, and capacity-based residential caps for designated areas. EHL requests that the County consider these tools as it refines the Project and feasible alternatives in the EIR process.

In particular, EHL encourages the development of an Town Center alternative whereby a UGB would define Town Center Development Area(s) within the plan area (or even within municipal boundaries with the cooperation of that jurisdiction). Here, where adequate infrastructure exists and located to minimize transportation impacts, increased densities could be attained by "retiring" outlying rural residential units through a TDR program. In this way, open space, habitat, and aesthetic values could be preserved or enhanced while providing for appropriate and sustainable development. Given impending development pressures, EHL believes that such a program is necessary to achieve the Update's rural preservation goals.

We would be happy to meet with Regional Planning Staff to discuss this concept in further detail.

If you would acknowledge your timely receipt of these comments by return message, that would be appreciated. Also, please place EHL on all distribution and notification lists for the Project, such as CEQA documents and public hearings.

Thank you for your consideration.

Very truly yours,

Dan Silver MD  
Executive Director

Dan Silver, Executive Director  
Endangered Habitats League  
8424 Santa Monica Blvd., Suite A 592  
Los Angeles, CA 90069-4267

213-804-2750

[dsilverla@me.com](mailto:dsilverla@me.com)

[www.ehleague.org](http://www.ehleague.org)



Three Points Liebre Mountain Town Council  
P O Box 617  
Lake Hughes, CA 93532  
3pointsliebremountain@gmail.com

13 September 2011

VIA EMAIL

Ms. Connie Chung  
General Plan 2035  
Los Angeles County Regional Planning  
1320 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Chung,

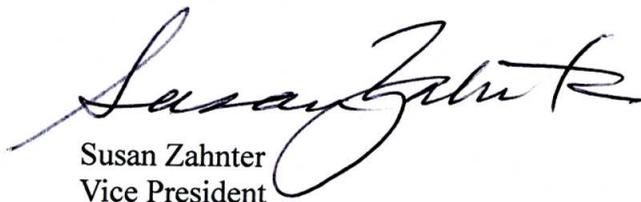
We are writing in response to the Notice of Preparation for the Los Angeles County General Plan 2035 (GP 2035). Since our rural town council area resides in the midst of the Angeles National Forest, the newly proposed San Andreas SEA, local agricultural lands, and open space of the Northwestern Antelope Valley, we feel the Environmental Impact Review document should include the effects of goals and policies that will guide, and ultimately, impact these natural resource areas.

We see conflicts between the Conservation and Open Space policies outlining preservation of open space, habitats, scenic areas, and ecosystems, and those policies promoting renewable energy. Wind and solar energy require vast swaths of land, essentially, many thousands of acres. It would seem prudent to review the possible cumulative effects of a thirty year projected buildout of utility-scale renewable energy on large tracts of land currently designated as SEAs, areas of scenic importance, irreplaceable habitats and ecosystems, significant ridgelines, rural communities, and agriculture; where siting of projects is considered favorable and where the impacts are most destructive and least able to be mitigated to less than significant.

We know the California Environmental Quality Act requires that EIRs address impacts to local services, infrastructure, and affected communities. We would like to see the EIR explore those impacts related to "boom or bust" economies created by utility-scale renewable energy, promoted by the GP 2035, that affect local rural businesses, schools, traffic, roads, air quality, fire control, and police protection.

Sincerely,

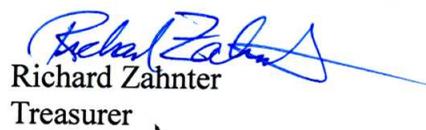
  
Chris Wangsgard  
President



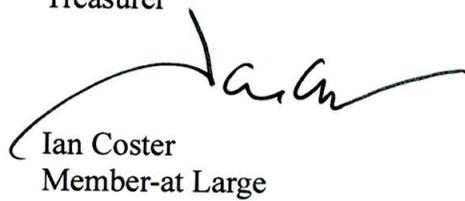
Susan Zahnter  
Vice President



Karen Plemmons  
Karen Plemmons  
Secretary



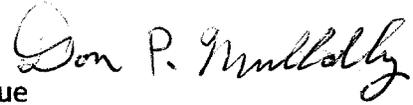
Richard Zahnter  
Treasurer



Ian Coster  
Member-at Large

September 12, 2011

Don P Mullally  
10418 Gothic Avenue  
Granada Hills, CA 91344



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



SEP 14 2011

**Subject: Comments by Don P. Mullally regarding Notice of Preparation of a Draft Environmental Impact Report for the Update of the Los Angeles County General Plan, Unincorporated Areas**

**Comments on the following elements of the Draft General Plan: page 3**

**Mobility Element.** The Open Spaces of the entire county have few good paved entrance roads; few roads, mostly poor, privately owned by citizens; and commonly, no roads at all. Since future use and entry is being considered, perhaps all roads should have standards if they are to be used by automobiles.

**Air Quality Element.** The hills of Los Angeles County are covered with various types of native vegetation that subsist on only natural water – rainfall. These vegetations improve air quality. They are referred to as the lungs of Los Angeles. Santa Clarita depends on the vegetation of western San Gabriel Mountains and the Santa Susana Mountains to help purify the polluted air of Los Angeles before it reaches Santa Clarita. The differences can frequently be observed.

Perhaps County Planning employees remember the brush and grass burning wildfire that occurred circa three years ago on the south-facing slope of the western San Gabriel Mountains and the Santa Susana Mountains. This fire denuded the slopes. After the fire came fierce Santa Ana winds. These winds lifted clouds of dust and ash from the burned land. Thick layers of it covered the northern half of San Fernando Valley. People feared for their lungs and lives. Many stayed indoors. Plans to build private schools for children on the slopes of these hills were cancelled, perhaps by city or county planning.

**Conservation and Open Space.** Undeveloped Open Spaces within the ranges of hills in Los Angeles County provide for the continuing survival of many species of animals, plants, and their habitats. Reducing the size of these already impacted natural open spaces jeopardizes our native vegetation and wildlife.

Conservation is not preservation, but it is better than nothing.

Needless to say, thousands of citizens would rather walk, hike, and merely enter these hills each day or week that do anything else for mental relaxation and recreation.

Also present are our wonderful views. They often surround us from three out of the four basic directions. Are the people ready to lose those to bad decisions, dynamite, and machines?

Parks and Recreation. We have urban and suburban parks. We need what they provide. We also need wilderness parks such as Malibu Canyon State Park and the Santa Clarita Woodlands Park basically supervised and owned by the Santa Monica Mountains Conservancy. Believe it or not, crowds of people use the Santa Clarita Woodlands Park each weekend. O'Melveny Park on the wilderness edge of Granada Hills has over 700 acres of city wilderness, and it's also very popular. People want big wilderness parks, so save some land for big parks for an expanding population.

Noise. Escaping from all types of excess noise is very difficult. Because autos and gasoline are expensive, escaping from noise can also be expensive. Two possibilities come to mind if you are not wealthy and live in Los Angeles: 1. Go to the beach. 2. Enter the local open spaces or isolated agricultural areas. If relatively wealthy, drive into a major mountain range or far into the desert. Once again, the local open spaces are, for most people, the winners.

Safety Element. Please rely on statistics. Furthermore, everything is relative. Cars are much more deadly than airplanes. But few people care about the difference. A steep winding mountain road is more dangerous than a residential street.

Public Services and Facilities. Should we have some on every popular mountain peak in California? How about some on Oat Mountain, Sandstone Peak, Lady Mountain, Mt. Wilson, Mt. Baldy, Mission Peak, etc. I don't think so, nor on the roads and trails to these peaks. In towns, shopping centers, etc. the answer is Yes.

Economic Development. This generally proceeds with improvements in appearances, beauty and interest. It rarely follows degeneration and ugliness. So I wouldn't advise plans that will sooner or later result in less attractive or downright ugly environments. For instance, I've seen rural communities of unpainted, decaying homes in parts of the Mojave Desert which at one time were woodlands and savannas of Joshua trees, spring wildflowers, and sweet smelling shrubs. These areas could become farms and are now waiting for water that will probably never arrive.

## The Eleven Planning Areas

The ones I am potentially interested in are the San Fernando, Santa Clarita, Santa Monica Mountains, and Westside Planning Areas. Only potentially because I haven't learned which ones pertain to the Santa Susana Mountains. Maybe none of them do; in which case, perhaps the Proposed General Plan (Table 1) does. Lastly I am reading about General Plan Update, and Update the Special Management Areas, and Update Significant Ecological Areas boundaries. The Uptake description reads well, so I'm hoping for the best in the DEIR.

Table 1  
On pages 4 and 5 of 12, Proposed General Plan

### Questions

1. NIV – Mixes Use: What is this? Who and what is mixed? Locations?
2. OS – Conservation. Of what, where? Why no Preservation designation? Is County Planning against Preservation?
3. OS-PR – Parks and Recreation. 7147 acres is nearly in possession already. Are there no plans for sizeable new parks in the future?

RL20 – Rural Land 20. This reads like 2458 twenty acre ranches for many rich people. Are they all going to be in a gated, closed community?

5. H9 – Residential 9. I see 373,326 people living on 14,403 acres. What are the locations of these acres? Are that many people already living on the 14,403 acres?

### General Information by Don P Mullally

Perhaps you are aware that the people of the City of Santa Clarita value open space, parks, and wilderness so much that they voted to tax themselves to create a large sum of city money for acquiring land for those uses by their citizens and visitors.

Santa Clarita also avidly wants the Santa Susana Mountains to be a greenbelt separating it from San Fernando Valley.

Representatives of the National Park Service are investigating the biology, geography, geology, parks, and ownership of land in the Santa Susana Mountains. They are particularly interested in helping in the creation of wild animal movement and migration corridors between separate ranges of southern California hills.

**From:** Town & Country  
**Sent:** Monday, September 12, 2011 4:19 PM  
**To:** McCullough, Gwendolyn  
**Cc:** Chung, Connie  
**Subject:** FW: NOP Written Comment Regarding Update of the Antelope Valley Plan

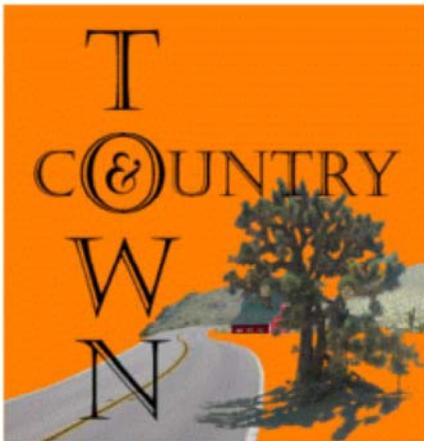
Gwen,

Please add this to the GP/AV EIR NOP list.

Thank you,  
 Thuy

(213) 974-6476 or dial (661) 272-0964 and then request a connection to 974-6476  
 7:30 a.m. to 5:30 p.m. Monday through Thursday

<http://planning.lacounty.gov/tnc>  
[tnc@planning.lacounty.gov](mailto:tnc@planning.lacounty.gov)




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**From:** Gunzel, Kurt [<mailto:kgunzel@cityoflancasterca.org>]  
**Sent:** Thu 9/8/2011 11:09 AM  
**To:** Town & Country  
**Subject:** NOP Written Comment Regarding Update of the Antelope Valley Plan

To whom this matter concerns:

I was involved in a number of meetings back about 2-3 years ago regarding the plan to update the Antelope Valley Plan at which time I brought up at public meetings, separate meeting with County representatives and comments made in writing regarding questions I had regarding the affects of the plan for the area.

The area of particular concern is specifically in the Quartz Hill community around 45<sup>th</sup> West and K-8. Zoning is A-1-10,000 with a general plan designation that limited development to 1 unit per acre at the time. Previously the County allowed subdivision to the limits of the a-1-10,000 zoning, as was reflected in the actual development pattern until the more restrictive land use. We were told the restriction was due to some issues the county needed to investigate relative to drainage and before this could be addressed for development purposes the area would be effectively restricted from development at the zoning density. The land use

designation restricted development to the overlaid zoning which was not consistent with the current or prior development pattern. Maps that I presented to the County reflected lots in the area developed down to the 10,000 square foot lot size consistent with a higher density.

I own property in this area which is why I have interest in the development that would be allowed. Properties adjacent to the west were subdivided in I believe the mid 70s to 15,000 square feet which was reflective of what we were also proposing with the subdivision map we submitted. Properties to the North have been developed down to 10,000 square feet and properties adjacent and North and South of our property range from a half acre to less than an acre.

In talking to County representative we were encouraged to do a local plan amendment, which was initiated and filed several years ago along with a subdivision map to create 15,000 square foot lots, but due to difficult times and unsurity in the economy we were unable to proceed due to loss of employment and difficulties a dissolution of a partnership I was not in a position to move forward financially. Plus the other option was to address the issue through the plan amendment at the time which was on the horizon. I tried to stay involved when I heard anything about the update to the plan and was actually sent information and correspondence until about two years ago when I didn't hear any more about the update, until the more recent scoping meeting which I unfortunately was unable to attend.

My question is what would be the procedure, at this time to see if the General Plan designation could go back to reflecting what was the development pattern for years (lots below 1 acre limit) and consistent with the actual underlying zoning of a-1-10,000.

The higher density was what our original subdivision proposal was several years back where we actually went thru a number of levels of staff review to approve our project at 15,000 square foot lots? The one-acre minimum designation just doesn't make sense as the area is developed with smaller parcels throughout the area and the larger rural lots is no longer consistent with the development that has occurred and is also an underutilization of property and wasteful of resources in light of the more recent infill development that has occurred during the last couple decades and what was encouraged by the County through the previous plan. Would appreciate the County's consideration of this and any information or suggestions that you can offer.

Thank you,  
Kurt and Susan Gunzel

**From:** Carlamamay@aol.com  
**Sent:** Tuesday, September 13, 2011 8:19 PM  
**To:** Plan, General  
**Subject:** Gen. Plan Update LA County and Antelope Valley Area Plan

Sept. 13, 2011

Connie Chung  
Supervisor Reg. Planning  
320 W. Temple St., Room 1356  
Los Angeles, CA 90012

Dear Ms. Chung,

I am responding to the General Plan Update - L.A. County and Antelope Valley Area Plan

It is time for the county, Los Angeles-Antelope Valley, consider the value in redevelopment, not large-scale development because of the need to preserve the natural environment of this region. There are large scale areas of suburban and urban sprawl and blight that need to be remedied before destroying our rivers, blue streams, groundwater, watersheds, wildlife and habitat, and natural beauty of mountains, foothills, open space and parklands/trails for humans.

The catch phrase "smart growth" makes sense. Building sustainable-living modestly priced townhouses, condos, apartments near mass transit (improving our Metrolink-rail-bus service) for commuters instead of adding more car lanes that still keep our freeways clogged is the direction Los Angeles needs to adopt. In these economic times, with thousands of foreclosures, bank closures, turmoil in the mortgage industry, now is the time to focus on renewal with a vision for the future. Los Angeles is park poor leaving children and adults nothing but a dismal, unhealthy environment. The future needs are to go vertical with pockets of open space-parkland in the urban areas and protect the existing open space-watersheds.

There are two major developments: Newhall Ranch and Hidden Creeks Estates developments are examples of what Los Angeles County should not allow. Newhall Ranch, with 21,000 homes and destruction of the Santa Clara River by concreting sections and building in a flood plain is an abomination. Hidden Creeks Estates-Porter Ranch will destroy a premier wilderness area of the Santa Susana Mountain foothills and a crucial Los Angeles River watershed. The impact of destroying the open space land in Browns Canyon will have grave consequences for a number of endangered native plants and the wildlife-birds in this area. It also doesn't make sense to build homes in a known natural landslide area riddled with fault lines and a high-wildfire zone.

The Santa Monica-Simi Hills-Santa Susana Mountains-Angeles National Forest-San Gabriel Mountains are part of the Rim of the Valley Wildlife Corridor (ROV) study in the Federal Department Interior. The vanishing landscape is not just a loss of wildlife habitat but a place for humans to enjoy passive recreation, rejuvenate and enjoy the beauty of our natural surroundings. Los Angeles County must consider the value of protecting the ROV for future generations.

Thank you for reviewing my comments.

Carla Bollinger  
24425 Woolsey Cyn. Rd. #102  
West Hills, CA 91304  
818-307-6418  
[carlamamay@aol.com](mailto:carlamamay@aol.com)

Affiliations but not speaking on behalf: Santa Susana Mountain Park Association Board Member, SFV Audubon Society, L.A. Chapter Sierra Club, Allied Artists of Santa Monica Mountains and Seashore

September 9, 2011

They Hue, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Ms. Hue:

I am hereby responding to the above stated Notice of Preparation (NOP). I am opposed to exclusively utilizing the proposed goals, policies, implementing programs, land use designations (density and intensity) in the Draft Antelope Valley Area Plan: Town & Country (Draft Plan) for the Environmental Impact Report (EIR) study. The Draft Plan is currently under active review by the community, and has not yet been fully vetted for use in an EIR. Accordingly, I am requesting the EIR study include the range of land use designations associated with the current Land Use Plan and the Draft Plan.

Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, I have a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The down zoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. In 2010 the median home sales price in the high desert was \$125,550 and was the most affordable housing region in the State, during a time when the County median sales price was \$346,840. The down zoning resulting from the proposals found in the Draft Plan must result in an up zoning in other, less-affordable areas, as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County will be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented.

Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

Government agencies implementing SB 375 should not regard development, or the prohibitions of development, as the sole solutions for meeting their Greenhouse Gas (GHG) emission reduction target. Housing affordability, construction costs and other economic impacts must be considered when evaluating measures proposed for meeting the goals of SB 375.

As stated in the Notice,

“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of my request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, I request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,

Steve Burton RDC-PRO  
Keller Williams Realty  
The Burton Team  
1401 W Rancho Vista Blvd.  
Palmdale Ca. 93551

Off: 661-274-8300  
Cell: 661-857-0440  
fax: 866-529-5281  
sburton@kw.com  
DRE# 00921720



To Ms. Thuy Hua  
 County of Los Angeles  
 Department of Regional Planning



9-6-11

**Los Angeles County General Plan and Antelope Valley Area Plan Updates  
 Draft Environmental Impact Report (EIR) Scoping Meeting  
 September 6, 2011**

**Written Comment Form**

The purpose of the public scoping meeting is to obtain input from the public regarding the scope and the alternatives that will be analyzed in the Draft EIR for Los Angeles County General Plan and Antelope Valley Area Plan Updates. The proposed project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update and Antelope Valley Area Plan Update focus growth in the unincorporated areas with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas. The project will replace the adopted General Plan (excluding the Housing Element, adopted in 2008) and the adopted Antelope Valley Area Plan.

A Notice of Preparation (NOP) for the Draft EIR, which describes the project and outlines the potential environmental impacts, has been prepared. The NOP is available for review from August 15, 2011 to September 14, 2011 on the Department of Regional Planning's website at <http://planning.lacounty.gov/generalplan> and <http://planning.lacounty.gov/tnc>. Copies of both Draft Plans can be found online at <http://planning.lacounty.gov/>.

Comments can be provided verbally at the scoping meeting or in written form. Anyone wishing to make formal comments on the NOP must do so in writing. The deadline for submitting written comments to the County is **5:00pm Wednesday, September 14, 2011**. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope of the Draft EIR for the proposed project. Your comments will then be considered during preparation of the Draft EIR.

Sect 15 T4N R8W APN 3064-016-021 80 acres

Jesus Cr runs across the corner of our property. It is NOT an accepted Road. We've owned our land since 1967 and it seems like you are taking it away from us.

W/O The map of land uses / ~~the~~ proposed zones How can we comment I spent 3 1/2 Hours at the Agoura Hills library & still don't know what I can do w/ my land.

If I am in a flood zone isn't it ridiculous in Mtn area w/ rain average (NOP yours) of less than 9" per year

What were the 3 species you are focused on.

Name: Mary Justice Room & address downtown to see proposed land use.

Address: 3998 Avenida Verano

City/Zip Code: Thousand Oaks, CA 91360

Telephone/E-mail: ATTANIA7@gmail.com

APN 3064-016-021

Please leave this form in the box provided or deliver or mail it to Ms. Thuy Hua, AICP, Senior Planner, Los Angeles County, Department of Regional Planning, 320 W. Temple Street, Room 1354, California 90012. This form can simply be folded and placed in a mailbox. Please remember to add postage.

## Town Country

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**From:** Gunzel, Kurt [kgunzel@cityoflancasterca.org]  
**Sent:** Thursday, September 08, 2011 11:09 AM  
**To:** Town & Country  
**Subject:** NOP Written Comment Regarding Update of the Antelope Valley Plan

To whom this matter concerns:

I was involved in a number of meetings back about 2-3 years ago regarding the plan to update the Antelope Valley Plan at which time I brought up at public meetings, separate meeting with County representatives and comments made in writing regarding questions I had regarding the affects of the plan for the area.

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Thank you,  
Kurt and Susan Gunzel



**LAND DESIGN CONSULTANTS, INC.***Land Planning, Civil Engineering, Surveying & Environmental Services*

September 7, 2011

Ms. Thuy Hua  
Senior Regional Planner  
County of Los Angeles Department of Regional Planning  
320 W. Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Town & Country Notice of Preparation (NOP) & Town and Country Area Wide Update (Antelope Valley Area Wide General Plan)

Dear Ms. Hua

On behalf of MDM Gorman Post Ranch LP., we are responding to the County's Notice of Preparation (NOP) for the Environmental Impact Report for the County's proposed Town & County update of the Antelope Valley Area wide General Plan. MDM owns approximately 2,720 acres of land (within 17 parcels) in the Gorman Area located on Gorman Post Road between the Town of Gorman and Highway 138. (APN 3251-001-018, 019; 3252-002-001; 3252-016-019, 024; 3252-003-014; 3252-004-010; 3252-004-013; 3252-005-001; 3251-017-005; 3252-009-002, 003; 3252-009-001; 3252-010-007; 3252-008-011 & 3252-010-011)

The project known as Vesting tentative Tract map 62053, County case Number 200500016 was originally filed with the County in 2005 and has been an active project with the latest plan revisions filed with the Department of Regional Planning on March 10, 2011. The project 1<sup>st</sup> Screen Check Environmental Impact report (DEIR) was submitted to the County in October 2007. The current Antelope Valley Area wide General Plan has designated the property As N-1 Non-Urban hillside Management Area & SEA

The Proposed Town & Country update is proposing changing the Land Use Designation from N-1 Non-Urban Hillside to RL 20 - Rural Land 20 (1du/20acres) and RL 40 - Rural Land 40 (1du/40 acres) considerably reducing the allowable density. The proposed Town & Country update has designated the Gorman Area as a "**Rural Town Center Area**" and is proposing increasing the Commercial Land Use designation (CR - Rural Commercial) on the adjacent property located south westerly of the property between the I 5 freeway and Gorman Post Road.

The property owner is objecting to the Land Use Designation changes from N-1 (non-urban hillside) to RL20- Rural Land 20 (1du/20acres) & RL40 - Rural land 40 (1du/40 acres). The property owner's development team has been in the entitlement process for over seven (7) years and request the proposed Land Use Changes be more consistent with the Current Antelope Valley Area Wide Plan and the project be identified in the Plan as a pending application as part of the Town & Country plan update. The property is located and takes access from a County designated Secondary

Ms. Thuy Hua  
County of Los Angeles

September 7, 2011  
Page 2 of 2

Highway (Gorman Post Road) and is within the influence area of the proposed "Rural Town Center Area" designation for Gorman, and is in close proximity to over 145 acres of commercially designated lands all located within the I 5 Freeway and Highway 138 corridor.

It is our belief that the Gorman Community should be provided with a greater mix of residential and commercial uses with the direct access along the I 5 Freeway and Highway 138 corridors. To provide this mix of housing a "Rural Town Area" should be designated to provide an appropriate transition between the "Rural Town Center Area" and the "Rural Preserve Area". This would be consistent with directing future growth around the "Rural Town Center Area" designation for the Town of Gorman and its ability to support future commercial along this portion of I 5 Freeway Corridor.

This important economic link at Gorman with the Antelope Valley (HWY 138) must be promoted and not diminished. The planning of this area needs to promote service and other support necessary to insure this vital link. Similarly, the Major economic link along Interstate 5 must be supported by all essential services as junctions like this, including residential along with preservation.

We look forward to working with County on the Town & Country update and the appropriate Land Use Designation for the property and the Gorman Area.

Sincerely,  
LAND DESIGN CONSULTANTS, INC.



Steve Hunter  
Vice President

- C. Mark Majer/MDM Gorman Post Ranch LP
- Ian Harvey/ MDM Gorman Post Ranch LP
- Bryan Avilla/ MDM Gorman Post Ranch LP

September 9, 2011

They Hue, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Ms. Hue:

I am hereby responding to the above stated Notice of Preparation (NOP). I am opposed to exclusively utilizing the proposed goals, policies, implementing programs, land use designations (density and intensity) in the Draft Antelope Valley Area Plan: Town & Country (Draft Plan) for the Environmental Impact Report (EIR) study. The Draft Plan is currently under active review by the community, and has not yet been fully vetted for use in an EIR. Accordingly, I am requesting the EIR study include the range of land use designations associated with the current Land Use Plan and the Draft Plan.

Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, I have a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The down zoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. In 2010 the median home sales price in the high desert was \$125,550 and was the most affordable housing region in the State, during a time when the County median sales price was \$346,840. The down zoning resulting from the proposals found in the Draft Plan must result in an up zoning in other, less-affordable areas, as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County will be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented.

Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

Government agencies implementing SB 375 should not regard development, or the prohibitions of development, as the sole solutions for meeting their Greenhouse Gas (GHG) emission reduction target. Housing affordability, construction costs and other economic impacts must be considered when evaluating measures proposed for meeting the goals of SB 375.

As stated in the Notice,

“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

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Sincerely,

Steve Burton RDC-PRO  
Keller Williams Realty  
The Burton Team  
1401 W Rancho Vista Blvd.  
Palmdale Ca. 93551

Off: 661-274-8300  
Cell: 661-857-0440  
fax: 866-529-5281  
sburton@kw.com  
DRE# 00921720

## Town Country

---

**From:** Ann Trussell [ann@antrussell.com]  
**Sent:** Sunday, September 11, 2011 1:37 PM  
**To:** Town & Country  
**Cc:** fifthdistrict@lacbos.org  
**Subject:** Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

September 11, 2011

Michael D. Antonovich  
Fifth District Supervisor  
Los Angeles County Supervisor  
500 West Temple Street, Room 869  
Los Angeles, CA 90012

**Thuy Hua, AICP, Senior Regional Planner**  
**Los Angeles County Department of Regional Planning**  
**320 West Temple Street, Room 1354**  
**Los Angeles, CA 90012**

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Supervisor Antonovich and Ms. Hua:

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Sincerely,

Ann Trussell, DRE 01101515  
REALTOR, GRI, e-Pro, SFR  
Short Sales & Foreclosure Resource

HOMEBASED REALTY  
42402 10TH Street West, Suite J  
Lancaster, CA 93534  
661-269-0991  
Cell 661-713-2358  
[ann@antrussell.com](mailto:ann@antrussell.com)

September 9, 2011

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

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## Notice of Preparation of EIR Response

Thuy Hua

Page 2

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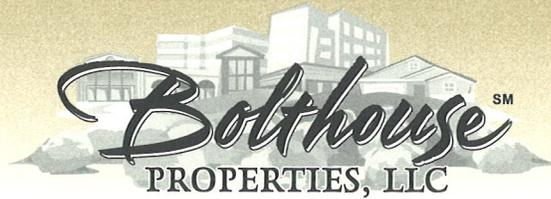


Broker Assoc

Keller Williams AV Realty

213 626-0434

213 974-1010



2000 Oak Street, Suite 250 • Bakersfield, CA 93301  
Ph: (661) 323-4005 • Fax: (661) 323-4006  
www.BolthouseProperties.com

September 13, 2011

THUY HUA, AICP  
Department of Regional Planning  
Community Studies North Section  
320 W. Temple Street  
Los Angeles, CA 90012

**Re: Notice of Preparation of a Draft Environmental  
Impact Report and Notice of Public Scoping  
Meetings**

Dear Ms. Hua:

Bolthouse Properties currently owns approximately 6,225 acres within the Antelope Valley Area Plan study area. Within this area approximately 4,244 acres currently lie within the unincorporated area of Los Angeles County, while approximately 1,981 acres lie within the cities of Lancaster and Palmdale. These properties, herein referred to as the "Study Area", are generally located in three separate regions, one being along E. Avenue K, one along E. Palmdale Blvd. at 165<sup>th</sup> Street East and one along E. Palmdale Blvd. at 240<sup>th</sup> Street East (please refer to **Exhibit 1 - Study Area**).

We have reviewed the Notice of Preparation for the Los Angeles County General Plan and the Antelope Valley Area Plan and would like to convey to the County of Los Angeles our existing and future interests for our landholdings. In particular, our continued interest in maintaining and preserving the agricultural use of our properties as well as protecting our interests for future utility scale renewable energy production.

**Existing and Proposed General Plan Land Use Designations**

In accordance with the 1986 Antelope Valley Area Plan, our land that lies within the unincorporated area of Los Angeles County is currently designated as Non-Urban 1 (N1). As you know, this land use designation limits development to one dwelling unit per two acres of land and is intended to: "preserve agricultural uses, limit density, promote clustered development and conserve open space and natural area."

Under this existing General Plan land use designation, Bolthouse Properties is currently involved in agricultural activities on all of these

parcels. The continued agricultural production of these parcels not only helps to maintain the existing rural character of the region, but also serves as a major economic and employment driver for the County.

With the introduction of the Preliminary Draft Antelope Valley Area Plan, our land within unincorporated Los Angeles County is proposed to be included under new General Plan land use designations. Approximately 4,203 acres are proposed to be included under the County's Rural Land 20 (RL-20) land use designation while one, approximately 40-acre parcel, is proposed to be included under the County's Rural Land 10 (RL-10) land use designation (please refer to **Exhibit 2 - Proposed General Plan Land Use**).

Both the proposed RL-20 and RL-10 land use designations would classify these parcels as part of the County's Rural Preserve. In accordance with the Preliminary Draft Antelope Valley Area Plan, development in this area is limited to single family homes at very low densities, and when appropriate, light and heavy agricultural uses, including equestrian and animal-keeping uses.

We agree with the County of Los Angeles in that the RL-10 and RL-20 land use designations are appropriate for our properties. We would like to express to the County our support in maintaining these land use designations to protect our existing and future agricultural interests.

### **Draft Renewable Energy Production Priority Map & Renewable Energy Ordinance**

It is our understanding the Draft Renewable Energy Production Priority map, which was publically introduced at a community meeting on June 18, 2011 has been retracted due to concerns raised by stakeholders. In place of the Draft Renewable Energy Production Priority Map, the County will be drafting a Renewable Energy Ordinance. This ordinance is anticipated to incorporate the information used in the development of the Draft Renewable Energy Production Priority Map, but it will also address more specific concerns, such as locational criteria, decommissioning, and development standards.

Bolthouse Properties currently has land under option to be developed as utility scale solar energy projects. This land, which consists of approximately 1,570 acres is outlined in red in **Exhibit 3 – Options for Utility Scale Solar Resources** and further described below:

THUY HUA, AICP  
Department of Regional Planning  
September 13, 2011  
Page 3 of 3

- 32 parcels totaling 320 acres located in the northeast corner of the City of Lancaster.
- One 160 acre parcel located southwest of the E. Palmdale Blvd. and 165<sup>th</sup> Street E intersection.
- Four parcels totaling 1,090 acres southeast of the E. Avenue P and E. Palmdale Blvd. intersection.

Bolthouse Properties has and continues to work diligently with the County, State, and utility companies to further pursue these solar options. In fact, the options that apply to the 320 and 1,090 acre areas have been under contract for over two years. As a considerable amount of time and capital has been invested in pursuing these solar options, we would like to request that the County of Los Angeles take these options into consideration when preparing the Renewable Energy Ordinance. By protecting the future development of utility scale solar power the County and Bolthouse Properties will mutually benefit by implementing the Energy goals and policies in the Draft Antelope Valley Area Plan and encouraging the development of a clean and renewable source of energy.

We appreciate the County's consideration to 1) protect the existing agricultural uses of our properties through the RL-20 and RL-10 General Plan land use designations, and 2) protect the existing and future options to develop utility scale solar resources. We look forward to working with the County of Los Angeles throughout the environmental review process.

Please do not hesitate to contact me should you have any questions or would like to further discuss.

Sincerely,

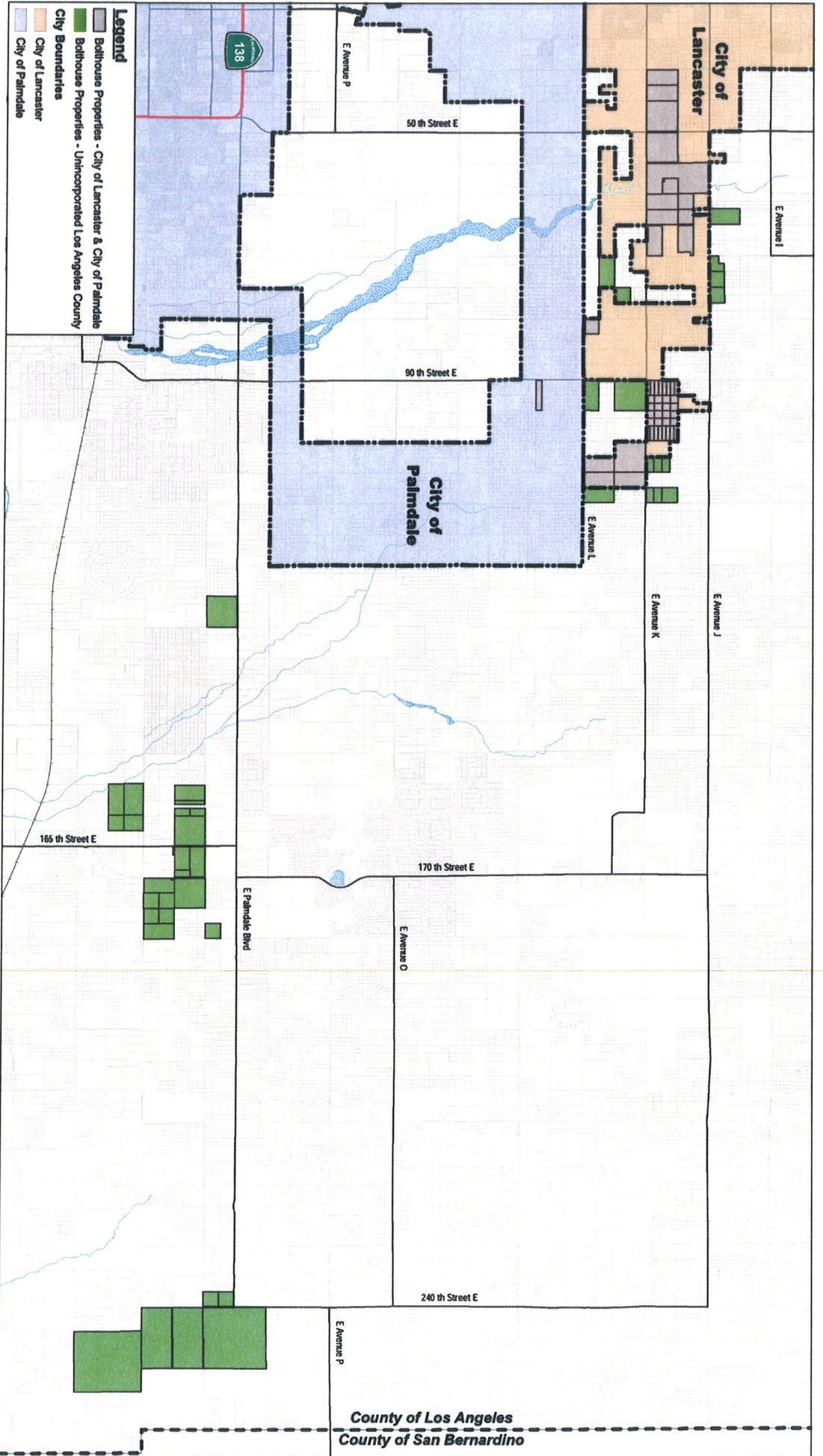


STEPHAN J. DeBRANCH  
Vice President of Development

SJD:jh  
CC: Alexa Washburn, Hogle-Ireland, Inc.  
Keith Carwana, Hogle-Ireland, Inc.

Attachments:

- 1) Exhibit 1 - Study Areas
- 2) Exhibit 2 - Proposed General Plan Land Use
- 3) Exhibit 3 - Options for Utility Scale Solar Resources



**Bolthouse Properties, LLC.**

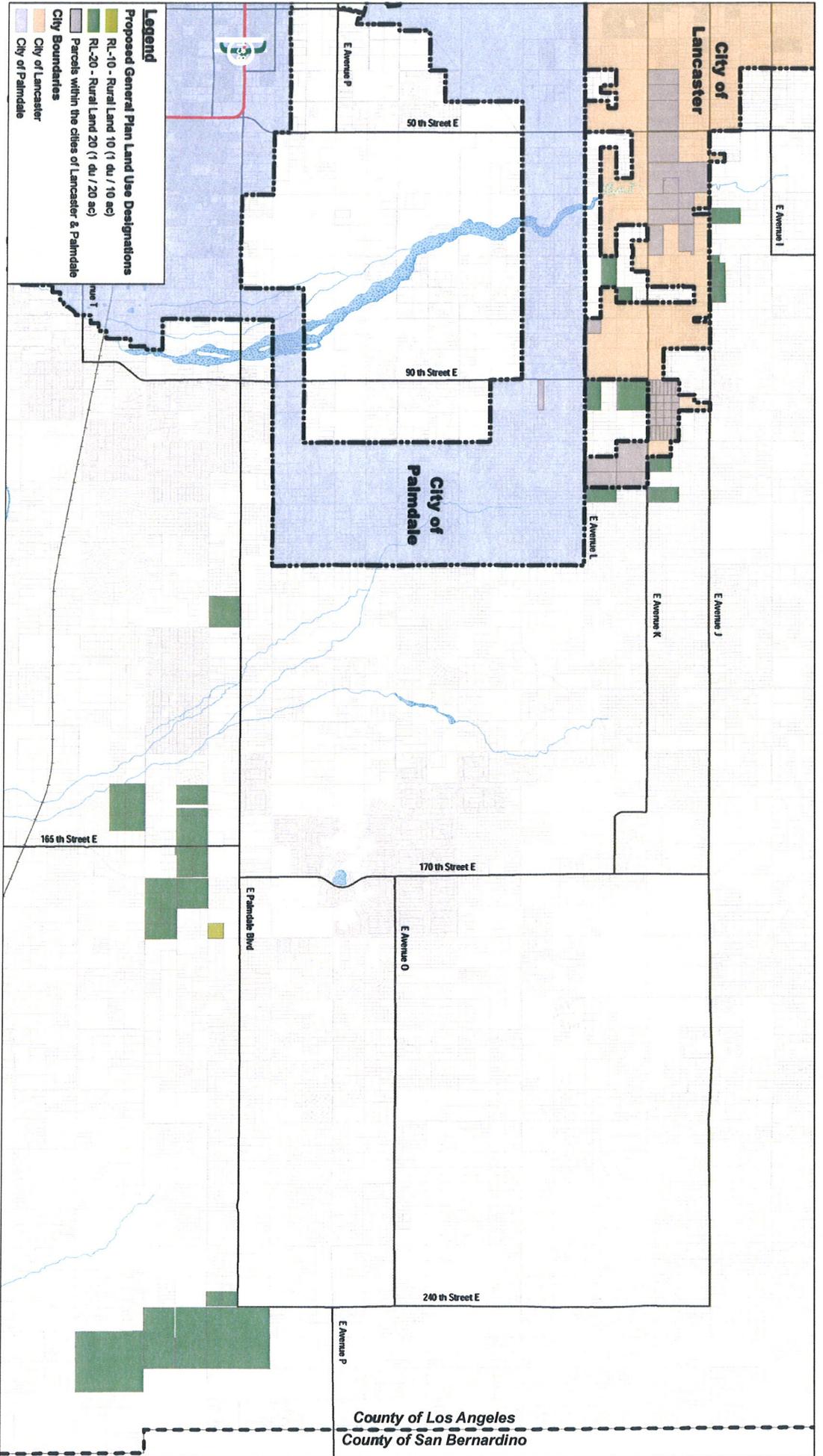
Exhibit 1 - Study Areas

Los Angeles County

September 13, 2011

X:\Invent\Projects\Bolthouse Properties\12565\_Antelope Valley Area Plan Analysis\GIS\XDO\PropertyMap\_Updated\_5.11.11.mxd

Not to Scale

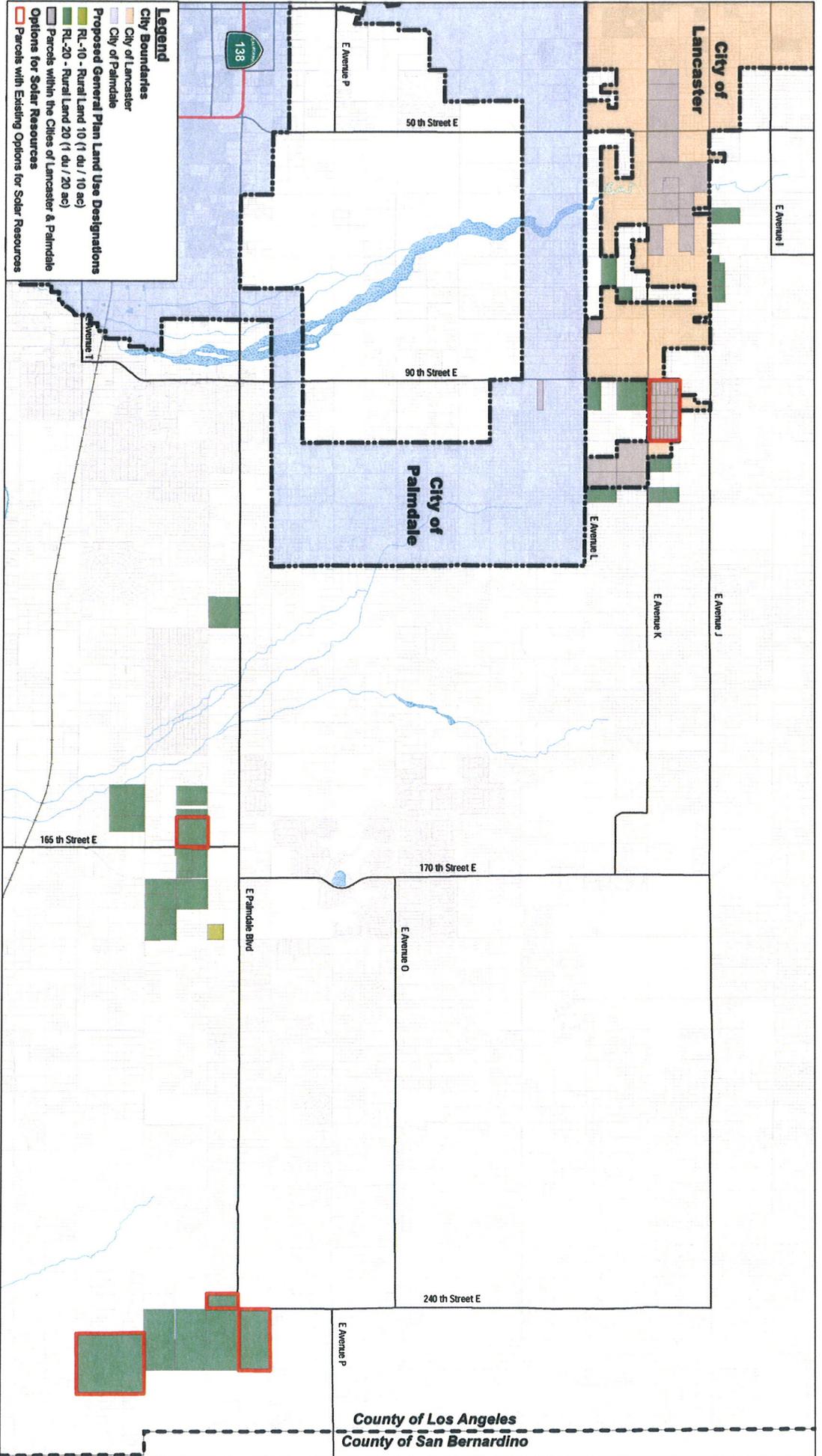


**Bolthouse Properties, LLC.**

**Exhibit 2 - Proposed General Plan Land Use**

Los Angeles County  
September 13, 2011  
X:\v\map\proposed\Bolthouse Properties\2855\_Antelope Valley Ave. Plan Analysis\GIS\MAP\DLand Use Map\_5.9.11.mxd

Not to Scale



**Bolthouse Properties, LLC.**  
 Exhibit 3 - Options for Utility Scale Solar Resources  
 Los Angeles County  
 September 13, 2011

Not to Scale

X:\Irvine\Projects\Bolthouse Properties\25855\_Antelope Valley Area Plan Analysis\GIS\MXD\Solar Resources Map\_9.11.11.mxd

County of Los Angeles  
 County of San Bernardino

## Town\_Country

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**From:** Diane Carlton [dianec@gavar.org]  
**Sent:** Wednesday, September 14, 2011 4:56 PM  
**To:** Town & Country  
**Cc:** Edel Vizcarra ; nhickling@lacbos.org  
**Subject:** Response to Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

September 14, 2011

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Ms. Hua:

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Sincerely,  
Diane Carlton  
Quartz Hill, CA

[diane.carlton@roadrunner.com](mailto:diane.carlton@roadrunner.com)

September 9, 2011

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320 West Temple Street, Room 1354  
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Sincerely,

Dave Slover  
President Elect of the Greater Antelope Valley Association of REALTORS

September 13, 2011

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Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1354  
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As stated in the Notice,

“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of my request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, I request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,

s/Steve Rice

Steven Rice, Realtor®  
43912 20<sup>th</sup> St W  
Lancaster, CA 93534  
[steve.rice@coldwellbanker.com](mailto:steve.rice@coldwellbanker.com)  
661-305-0561

**LAND DESIGN CONSULTANTS, INC.***Land Planning, Civil Engineering, Surveying & Environmental Services*

September 7, 2011

Ms. Thuy Hua  
Senior Regional Planner  
County of Los Angeles Department of Regional Planning  
320 W. Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Town & Country Notice of Preparation (NOP) & Town and Country Area Wide Update (Antelope Valley Area Wide General Plan)

Dear Ms. Hua

On behalf of MDM Gorman Post Ranch LP., we are responding to the County's Notice of Preparation (NOP) for the Environmental Impact Report for the County's proposed Town & County update of the Antelope Valley Area wide General Plan. MDM owns approximately 2,720 acres of land (within 17 parcels) in the Gorman Area located on Gorman Post Road between the Town of Gorman and Highway 138. (APN 3251-001-018, 019; 3252-002-001; 3252-016-019, 024; 3252-003-014; 3252-004-010; 3252-004-013; 3252-005-001; 3251-017-005; 3252-009-002, 003; 3252-009-001; 3252-010-007; 3252-008-011 & 3252-010-011)

The project known as Vesting tentative Tract map 62053, County case Number 200500016 was originally filed with the County in 2005 and has been an active project with the latest plan revisions filed with the Department of Regional Planning on March 10, 2011. The project 1<sup>st</sup> Screen Check Environmental Impact report (DEIR) was submitted to the County in October 2007. The current Antelope Valley Area wide General Plan has designated the property As N-1 Non-Urban hillside Management Area & SEA

The Proposed Town & Country update is proposing changing the Land Use Designation from N-1 Non-Urban Hillside to RL 20 - Rural Land 20 (1du/20acres) and RL 40 - Rural Land 40 (1du/40 acres) considerably reducing the allowable density. The proposed Town & Country update has designated the Gorman Area as a "**Rural Town Center Area**" and is proposing increasing the Commercial Land Use designation (CR - Rural Commercial) on the adjacent property located south westerly of the property between the I 5 freeway and Gorman Post Road.

The property owner is objecting to the Land Use Designation changes from N-1 (non-urban hillside) to RL20- Rural Land 20 (1du/20acres) & RL40 - Rural land 40 (1du/40 acres). The property owner's development team has been in the entitlement process for over seven (7) years and request the proposed Land Use Changes be more consistent with the Current Antelope Valley Area Wide Plan and the project be identified in the Plan as a pending application as part of the Town & Country plan update. The property is located and takes access from a County designated Secondary

Ms. Thuy Hua  
County of Los Angeles

September 7, 2011  
Page 2 of 2

Highway (Gorman Post Road) and is within the influence area of the proposed "Rural Town Center Area" designation for Gorman, and is in close proximity to over 145 acres of commercially designated lands all located within the I 5 Freeway and Highway 138 corridor.

It is our belief that the Gorman Community should be provided with a greater mix of residential and commercial uses with the direct access along the I 5 Freeway and Highway 138 corridors. To provide this mix of housing a "Rural Town Area" should be designated to provide an appropriate transition between the "Rural Town Center Area" and the "Rural Preserve Area". This would be consistent with directing future growth around the "Rural Town Center Area" designation for the Town of Gorman and its ability to support future commercial along this portion of I 5 Freeway Corridor.

This important economic link at Gorman with the Antelope Valley (HWY 138) must be promoted and not diminished. The planning of this area needs to promote service and other support necessary to insure this vital link. Similarly, the Major economic link along Interstate 5 must be supported by all essential services as junctions like this, including residential along with preservation.

We look forward to working with County on the Town & Country update and the appropriate Land Use Designation for the property and the Gorman Area.

Sincerely,  
LAND DESIGN CONSULTANTS, INC.



Steve Hunter  
Vice President

C. Mark Majer/MDM Gorman Post Ranch LP  
Ian Harvey/ MDM Gorman Post Ranch LP  
Bryan Avilla/ MDM Gorman Post Ranch LP

September 9, 2011

Ms. Thuy Hua  
Senior Regional Planner  
County of Los Angeles Department of Regional Planning  
320 W. Temple Street, Room 1354  
Los Angeles, CA 90012

Re: Town & Country Notice of Preparation (NOP) & Town and Country Area Wide Update  
(Antelope Valley Area Wide General Plan)

Dear Ms. Hua,

MDM Gorman Post Ranch LP is the owner of approximately 2,720 acres of land (within 17 parcels) located on Gorman Post Road between the Town of Gorman and Highway 138. (APN's 3251-001-018, 019; 3252-002-001; 3252-016-019, 024; 3252-003-014; 3252-004-010; 3252-004-013; 3252-005-001; 3251-017-005; 3252-009-002, 003; 3252-009-001; 3252-010-007; 3252-008-011 & 3252-010-011). As property owners and applicant for the Gorman Post Ranch Project, we are responding to the County's Notice of Preparation (NOP) for the Environmental Impact Report for the proposed Town & County update of the Antelope Valley Area wide General Plan.

The Gorman Post Ranch Project, identified as Vesting Tentative Tract Map 62053 (County Case Number 200500016), was originally filed in 2005 and has been an active project with the latest plan revisions filed with the Department of Regional Planning on March 10, 2011. The Project's First Screen Check Environmental Impact Report (DEIR) was submitted to the County in October 2007. The current Antelope Valley Area wide General Plan has designated the property as N-1 Non-Urban Hillside Management Area & SEA.

The Town & Country update proposes a change in Land Use Designation from N-1 Non-Urban Hillside to RL 20 - Rural Land 20 (1du/20 acres) and RL 40 - Rural Land 40 (1du/40 acres), considerably reducing the allowable density. At the same time and seemingly inconsistent with the decrease in land use intensity proposed for our property, the current version of the Town & Country update has designated the Gorman area as a "Rural Town Center" and is additionally proposing increasing the commercial land use designation on the adjacent property located southwesterly of the Gorman Post Ranch property between the I-5 freeway and Gorman Post Road.

Our development has been in the entitlement process for over six (6) years and we request the proposed land use changes be more consistent with the current Antelope Valley Area wide Plan. The property is accessible from a County designated Secondary Highway (Gorman Post Road) and is within the immediate influence area of the proposed "Town Center" designation for Gorman. It is also in close proximity to over 140 acres of commercially designated lands all located within the I-5 freeway and Highway 138 corridor.

In the Notice of Preparation document for the Los Angeles County General Plan Update and Antelope Valley Area Plan Update, the County states under the Rural Preservation Strategy that there are three types of environments - Rural Town Center Areas, Rural Town Areas and Rural Preserve Areas. Rural Town Areas are described as areas that provide a transition between Rural Town Center Areas and Rural Preserve Areas. They are to be occupied by a mix of residential and light agricultural uses and the majority of new residential development should be directed to these areas. The County additionally states "**that allowable residential densities in these areas will generally be equal to, or greater than, allowable residential densities in the current Area Plan**".

The County has designated the town of Gorman as a Rural Town Center, and based on the Rural Preservation Strategy, land surrounding the Town Center should be designated as a Rural Town Area with, as stated above, **residential densities equal to or greater than the allowable densities in the current Area Plan**. However, our property is directly adjacent to the Rural Town Center of Gorman and instead of being designated as part of the Rural Town Area, it is being designated as part of a Rural Preserve Area, which is inconsistent with the Rural Preserve Strategy highlighted in the General Plan Update. The proposed change in land use for our property would not maintain densities equal to or greater than the current allowable densities, but rather would reduce the allowable density on our property by approximately 75%.

Additionally, under the General Plan Land Use Element, the County states that "an important component of sustainable land use is having a jobs/housing balance, which is a measure that is reached by working toward increasing opportunities for people to work and live in close proximity as to reduce long commutes that are costly both economically and environmentally". However, with regard to the town of Gorman, the County is proposing land uses that will hinder the ability to create a jobs/housing balance in the future. The County is promoting commercial development within the Gorman Town Center as well as additional commercial acreage at the intersection of I-5 and Highway 138 and further north along the I-5 between Highway 138 and the town of Gorman. While the County is promoting the future development of commercial along the I-5 and Highway 138 on neighboring parcels, they are simultaneously designating all additional surrounding properties as Rural Preserve, vastly limiting future residential development in the area and immediately creating the circumstance of a future jobs/housing imbalance in this important transit corridor.

We strongly object to the proposed land use designation changes from N-1 (non-urban hillside) to RL20 & RL40. Based on the information above, we request the proposed land use changes be more consistent with the current Antelope Valley Area wide Plan.

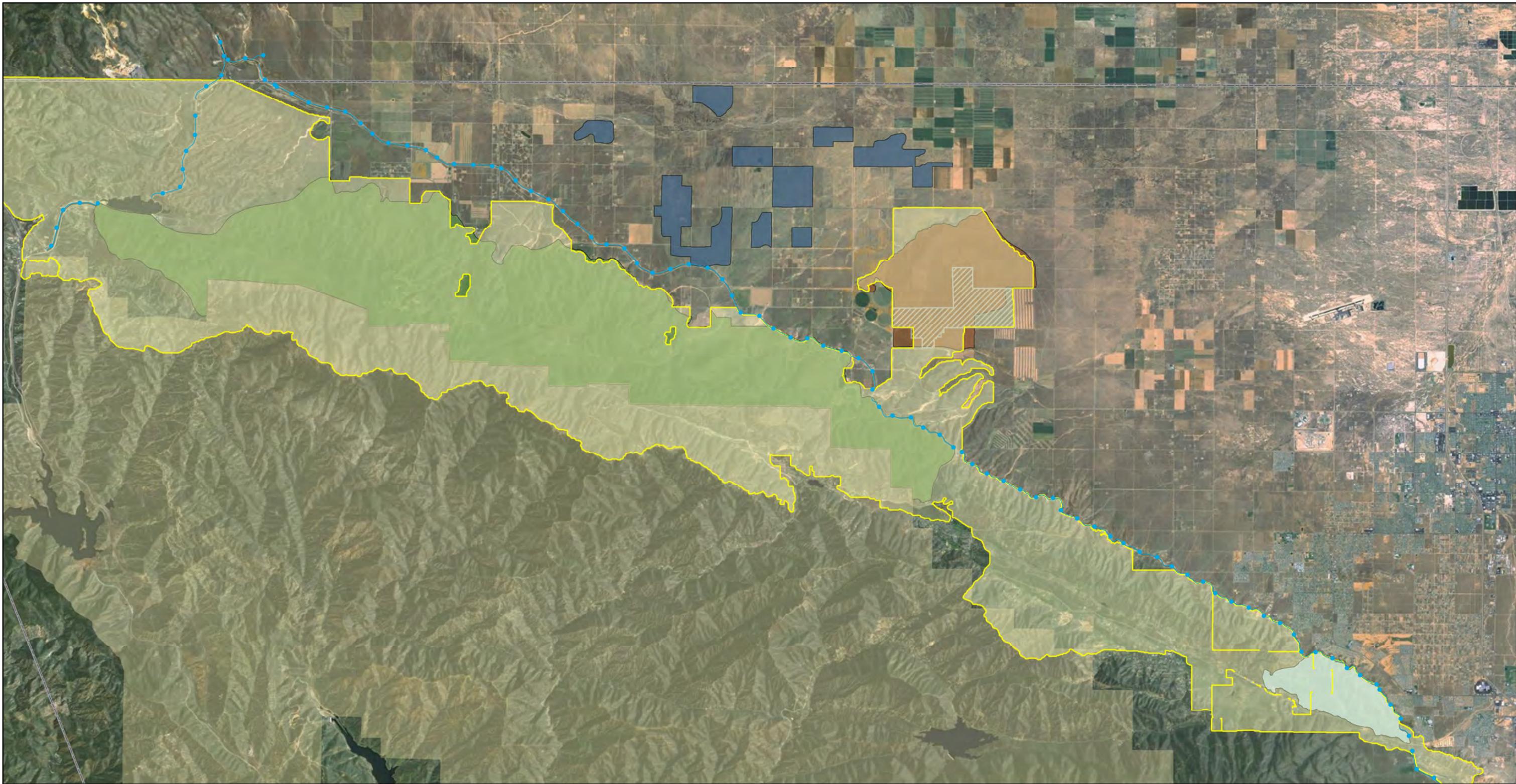
We look forward to working with the County on the Town & Country update and the appropriate Land Use Designation of the property.

Sincerely,  
MDM Gorman Post Ranch, LP



Mark Majer  
General Partner

- C. Ian Harvey/ MDM Gorman Post Ranch LP
- Bryan Avilla/ MDM Gorman Post Ranch LP
- Steve Hunter/ Land Design Consultants, Inc.



Natural Resource Consultants. 12 September 2011. S:\Element\_Power\Wildflower\_Green\_Energy\_Farm\05\_GIS\_Data\maps\workspace\Biota Report Graphics\SEA Compatibility\Ex 02\_ProposedSEAs\_NRC01\_20110912.mxd

- California Aqueduct
- County Boundaries
- Angeles National Forest
- Antelope Valley California Poppy Reserve SNR
- Fairmont-Antelope Buttes SEA No. 57
- Joshua Tree Woodland SEA No. 60
- Portal Ridge- Liebre Mountain SEA No. 58
- Ritter Ridge SEA No. 56
- San Andreas Rift SEA (proposed)

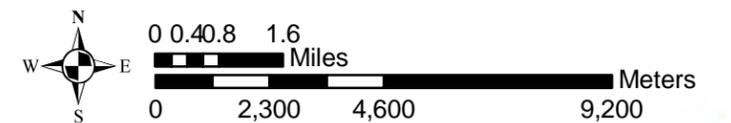
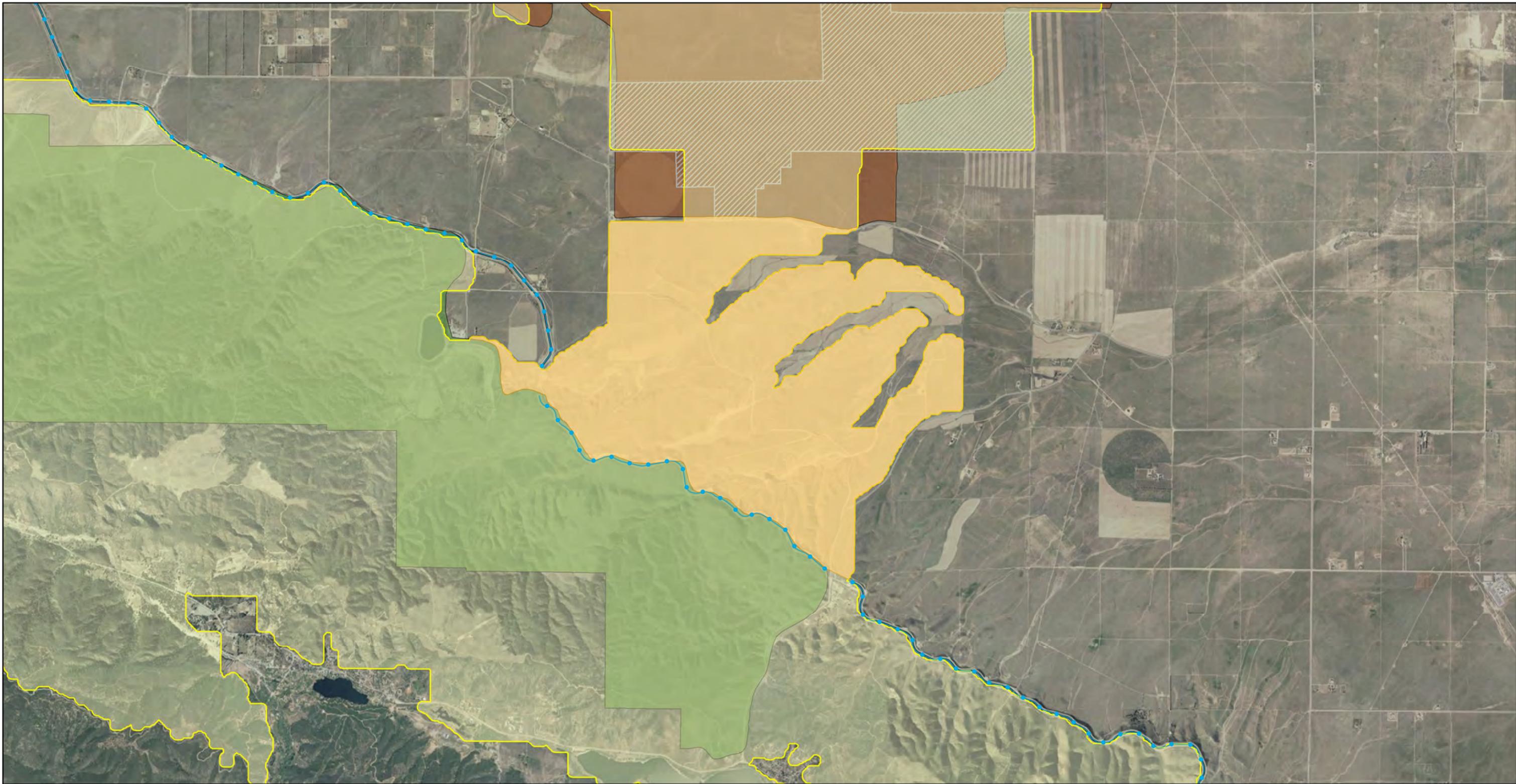


EXHIBIT 2: PROPOSED SIGNIFICANT ECOLOGICAL AREAS  
TOWN AND COUNTRY PLAN | LOS ANGELES COUNTY, CALIFORNIA





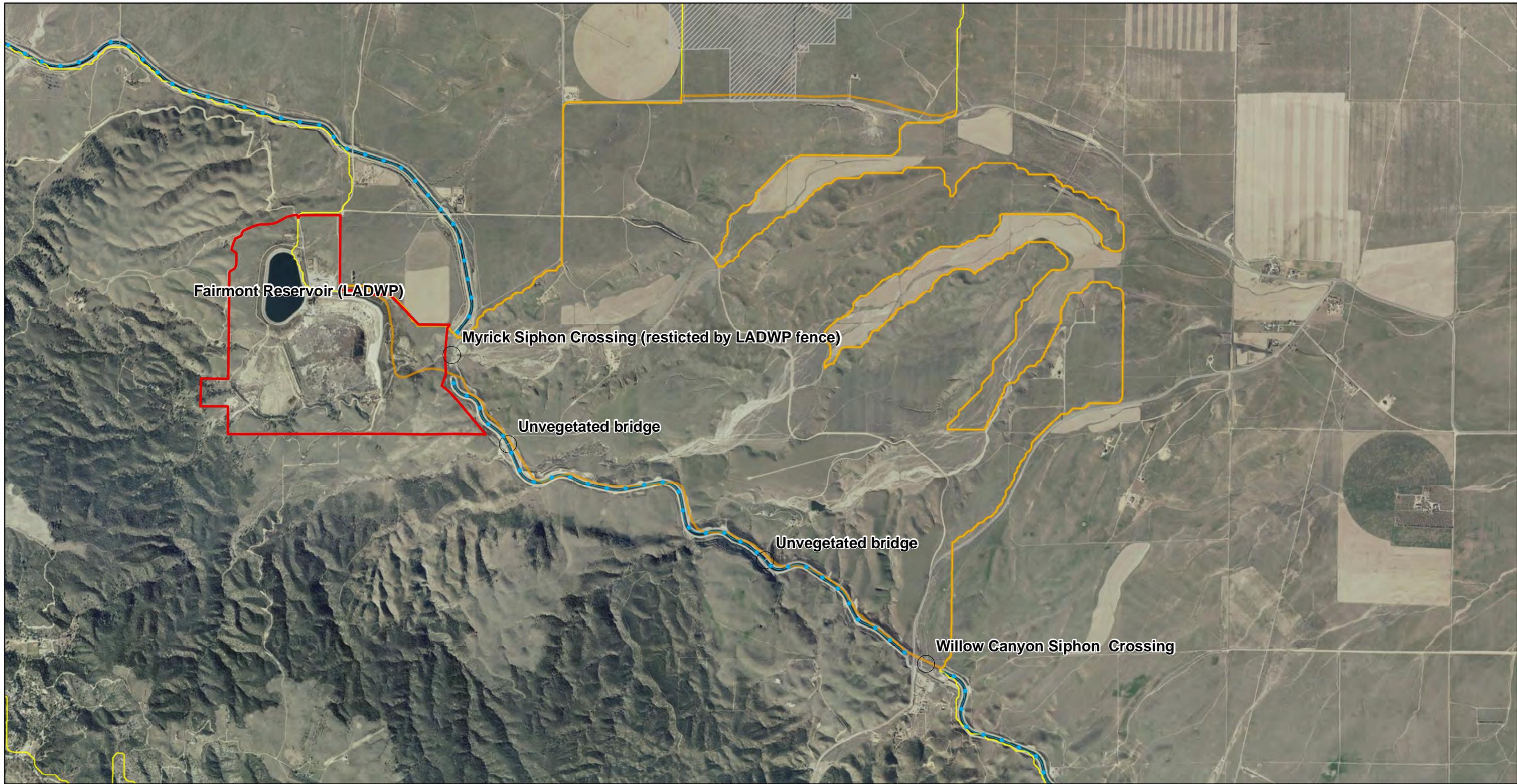
Natural Resource Consultants, 12 September 2011, S:\Element\_Power\Wildflower\_Green\_Energy\_Farm\GIS\_Data\maps\workspace\Biola Report Graphics\SEA Compatibility\Ex 02\_ProposedSEAs\_NRC01\_20110912.mxd

- California Aqueduct
- San Andreas Rift SEA (proposed)
- Linkage Area
- Antelope Valley California Poppy Reserve SNR
- Fairmont-Antelope Buttes SEA No. 57
- Joshua Tree Woodland SEA No. 60
- Portal Ridge- Liebre Mountain SEA No. 58
- Ritter Ridge SEA No. 56



EXHIBIT 3: PROPOSED LINKAGE AREA  
 TOWN AND COUNTRY PLAN | LOS ANGELES COUNTY, CALIFORNIA





Natural Resource Consultants, 12 September 2011, S:\Element\_Power\Wildflower\_Green\_Energy\_Farm\05\_GIS\_Data\maps\workspace\Biota Report Graphics\SEA Compatibility\Ex 04\_Aqueduct\Kings\_NRC01\_20110912.mxd

- California Aqueduct
- San Andreas Rift SEA (proposed)
- Seven Foot LADWP fencing
- Linkage Area
- Potential California Aqueduct Crossings



EXHIBIT 4: CALIFORNIA AQUEDUCT CROSSINGS  
 TOWN AND COUNTRY PLAN | LOS ANGELES COUNTY, CALIFORNIA





PHOTO 1:

POTENTIAL WILDLIFE CROSSING OVER THE CALIFORNIA AQUEDUCT WITHIN THE PROPOSED SAN ANDREAS SEA. NOTE THE ROW FENCING AND STEEP TERRAIN THAT, ALONG WITH THE AQUEDUCT, ITSELF, PRESENT FORMIDABLE BARRIERS TO WILDLIFE MOVEMENT.

PHOTO 2:

THE CALIFORNIA AQUEDUCT AND ASSOCIATED ROW FENCING WITHIN THE PROPOSED SAN ANDREAS SEA. THIS FEATURE GREATLY REDUCES WILDLIFE MOVEMENT IN THE PROPOSED LINKAGE AREA BETWEEN SEAS 57 AND 58.



PHOTO 3:

SECURITY FENCING (FOREGROUND) AND LADWP FENCING (BACKGROUND) AT MYRICK SIPHON. THESE SEVEN-FOOT TALL BARBED WIRE FENCES REDUCE THE EFFECTIVENESS OF THIS VEGETATED CROSSING FOR WILDLIFE MOVEMENT.



PHOTO 4:

VIEW LOOKING SOUTH AT MYRICK SIPHON. NOTE THE CALIFORNIA AQUEDUCT ROW FENCING (TOP LEFT) INTERSECTING WITH THE LADWP FENCING (TOP RIGHT), CREATING A FORMIDABLE BARRIER TO WILDLIFE MOVEMENT AT THIS CROSSING.





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Our File Number: 23EH-151714

September 14, 2011

**VIA E-MAIL AND U.S. MAIL**

Ms. Connie Chung  
Los Angeles County  
Department of Regional Planning  
320 W. Temple Street Rm. 1356  
Los Angeles, California 90012

**Re: Comment on Town and Country Plan for the Antelope Valley, Los Angeles County, California**

Dear Ms. Chung,

We are writing in response to the Notice of Preparation for the Los Angeles County General Plan Update and the Antelope Valley Area Plan Update in order to call your attention to areas warranting analysis in the environmental impact report for the Los Angeles County Town and Country Plan for the Antelope Valley ("EIR"). The EIR should analyze whether the proposed San Andreas SEA and its linkages actually provide wildlife movement benefits given the existing infrastructure and natural constraints in the area. As set forth below, there are existing impediments – most significantly the aqueduct itself – that hinder north-south wildlife movement, thereby limiting the environmental benefits gained by extending the San Andreas SEA boundaries north of the California Aqueduct. At the same time, inclusion of additional lands within the San Andreas SEA boundaries triggers additional restrictions and mitigation requirements that greatly increase the cost of developing renewable energy on that land.

In addition, the EIR should study whether the environmental benefits of extending the proposed San Andreas Fault Zone Significant Ecological Area ("San Andreas SEA") north of the California Aqueduct outweigh the environmental costs associated with placing additional restrictions and mitigation requirements onto land that might otherwise be used for renewable energy production. Given the environmental benefits, including air quality benefits, of increased renewable energy production, it is important to study whether the desired environmental benefits will actually be achieved before burdening additional lands with the further regulatory requirements that come with inclusion in the San Andreas SEA.

Ms. Connie Chung  
Los Angeles County  
Department of Regional Planning  
September 14, 2011  
Page 2

## INTRODUCTION AND BACKGROUND

### 1. The Town and Country Plan and Proposed Policies

The Los Angeles County's Department of Urban Planning is currently updating the Antelope Valley ("AV") Area Plan; a part of the Los Angeles County General Plan. This updated plan is called the Town and Country Plan (the "Plan") and is currently in the public and environmental review process. The Plan includes specific goals for the AV pertaining to biological resources (Goal COS 4), vegetation conservation (Goal COS 16), and energy (Goals COS 10-14). The focus of Goal COS 13 is to provide... "[u]tility-scale energy production facilities for offsite use that reduce consumption of non-renewable resources while minimizing potential impacts on natural resources and existing communities".

The Plan includes several environmental protection policies (e.g. Policies COS 13.1-13) designed to guide the development of utility-scale renewable energy projects within the AV. These policies identify three zones for renewable energy production (Exhibit 1). The High Priority Zone (Zone 1; Policy COS 13.2) require "basic conditions and mitigation measures for utility-scale renewable energy production facilities during the application review process because of the limited potential impacts they may have on known sensitive biotic communities." The Medium Priority Zone (Zone 2; Policy COS 13.3) requires "moderate conditions and mitigation measures for utility-scale renewable energy production facilities during the application review process because of the potential impacts they may have on the Swainson's hawk, Mojave ground squirrel, and desert tortoise species habitats, which are known sensitive biotic communities." Finally, the Low Priority (Zone 3; Policy COS 13.4) require stringent conditions and mitigation measures for utility-scale renewable energy production facilities during the application review process because of the potential impacts they may have on Significant Ecological Areas, which are known sensitive biotic communities.

### 2. Proposed San Andreas Fault Zone SEA

The proposed San Andreas Fault Zone Significant Ecological Area encompasses and connects several existing SEAs including the Portal Ridge SEA No. 58, the Fairmont and Antelope Buttes SEA No. 57, and the Ritter Ridge SEA No. 56 (Exhibit 1, Exhibit 2). The Joshua Tree Woodland SEA No. 60 is not included in this proposed conglomeration and expansion. As stated in *Los Angeles County Significant Ecological Area Update Study 2000; Background Report* (PCR 2000),

Ms. Connie Chung  
Los Angeles County  
Department of Regional Planning  
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*“The SEA designation does not protect biotic resources on land per se, and SEAs are not preserves or conservation areas; rather, SEAs are areas in which planning should be sensitive to resources and maintenance of biological functions as well. By creating larger SEAs, habitat linkage zones are provided between related habitat types (such as the Antelope Valley buttes, or the San Andreas Rift Zone wetlands), and areas of sufficient width, to function as wildlife movement routes between open space areas. The linkages may serve to sustain populational genetic diversity of low-mobility species (such as plants, amphibians, reptiles, rodents), as well as provide refuge areas for migrant species... In short, by “bridging the current SEA islands” wherever possible, zones of lower intensity human impacts between essential habitat resources have been provided, which help maintain overall species and habitat diversity in Los Angeles County.”*

Within the proposed San Andreas SEA, an area between the Portal Ridge and Fairmont and Antelope Buttes SEAs was included as a linkage between these two SEAs (Exhibit 3). At this linkage area “two large washes drain to the Valley floor, namely Myrick Canyon and Willow Springs Canyon. The vegetation transitions to grasslands as the SEA stretches north across the valley floor and encircles Fairmont Butte and the Antelope Buttes of the Antelope Valley California Poppy Reserve” (PCR 2006). According to PCR (2006), “[t]hese washes provide an important linkage for animals traveling between the mountains... and the Mojave Desert.”

## ANALYSIS

### 1. The California Aqueduct Inhibits North-South Linkage

The linkage between SEAs Nos. 57 and 58 is constrained by the California Aqueduct, fencing within the aqueduct right-of-way (ROW), and fencing associated with Fairmont Reservoir, regulated by the Los Angeles Department of Water and Power (LADWP). The California Aqueduct “presents a formidable barrier... to most terrestrial animals, with a 50-m wide expanse of water and paved bank slopes of about 100% (45°) slope” (Penrod et al. 2003) and there are no known (*north-south*) wildlife corridors near the California Aqueduct (URS 2009). Within the proposed linkage area, any movement of terrestrial wildlife must funnel through one of four aqueduct crossings (Exhibit 4). Of these four crossings, two (Myrick Siphon and Willow Springs Siphon) are vegetated areas where the aqueduct passes below ground; the other two crossings are unvegetated bridges that pass over the aqueduct. At Myrick Siphon, any linkage is almost entirely restricted by the presence of a seven foot tall chain link and barb wire security fence that encompasses Fairmont Reservoir (Exhibit 5). With this crossing all but entirely blocked, there are only three crossings at which wildlife can pass the aqueduct within the proposed linkage area. Thus, the importance of the San Andreas SEA between the California Aqueduct and SEA No. 57, for wildlife linkage is further compromised. With such barriers, the importance of this area may not warrant designation as an SEA.

Ms. Connie Chung  
Los Angeles County  
Department of Regional Planning  
September 14, 2011  
Page 4

2. The Proposed Boundary is not Consistent with Linkage Patterns Described in Scientific Literature

Additionally, the boundary of the proposed San Andreas SEA, where it connects the existing SEAs No. 57 and 58, is not consistent with scientific literature describing wildlife movement patterns in this area. According to initial studies (PCR 2006), Myrick and Willow Springs Canyons are specifically cited as the two primary linkage areas between the two existing SEAs. However, the boundary of the new SEA does not follow these canyons. Neither Myrick Canyon nor Willow Springs Canyon connects the Portal Ridge SEA with the Fairmont and Antelope Buttes SEA within the boundaries of the proposed San Andreas SEA. Instead, at both canyons, the proposed SEA boundary ends abruptly within these canyons, creating three "fingers". These three fingers do not connect to SEA No. 57. With both drainages and ridges truncated, the only potential connection that remains within the proposed SEA boundary is along a series of low lying ridges and bottomlands dominated by agriculture, annual grasslands, and wildflower fields. These vegetation types provide little cover for wildlife and are less favored wildlife movement areas for many local terrestrial species (e.g. bobcat, bear, mule deer). Furthermore, the substantial historic and ongoing grazing and agricultural activities throughout the area, including, for example, in areas in and around the former Shea's Castle, should be factored as part of any SEA proposals.

3. SEA Designation Imposes Additional Burdens on Renewable Energy Projects

It is clear from reviewing the Plan that the renewable energy priority zones were established, at least in part, on the basis of the boundaries for the SEAs and not exclusively based on the renewable energy potential of that land. Policy COS 13.4 of the Town And Country Plan states, "In the Low Priority Zone (Zone 3) of the Renewable Energy Production Priority Map, require stringent conditions and mitigation measures for utility-scale renewable energy production facilities during the application review process because of the potential impacts they may have on Significant Ecological Areas, which are known sensitive biotic communities." These additional "stringent conditions and mitigation measures" add significant costs and constraints to a renewable energy project, which could render the project financially infeasible or reduce the energy output of the project. The Plan specifically identifies renewable energy as an important alternative to fossil fuel consumption. This priority appears in conflict with measures in the Plan that may be infeasible or impracticable to implement given site-specific biological characteristics, standards in the renewable energy industry and generally best practices for preservation and mitigation that should be tailored to site-specific constraints and opportunities. The final location of the San Andreas SEA boundaries may impact the feasibility of some renewable energy projects and, therefore, the environmental costs and benefits should be studied against the status of quality resources on site and potentially the significant benefits of a

Ms. Connie Chung  
Los Angeles County  
Department of Regional Planning  
September 14, 2011  
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proposed renewable energy alternative before analyzing the environmental benefits of the proposed protocol and delineating the exact boundaries.

### CONCLUSION

The Town and Country Plan includes policies and goals to encourage renewable energy development and complementary polices designed to protect sensitive and general biological resources within the Antelope Valley. These are both noble goals and the County should strive to serve both goals to the maximum extent feasible. To that end, the EIR should study the environmental costs and benefits associated with the proposed San Andreas SEA boundaries to ensure that proper balance is found.

Very truly yours,



Alfred Fraijo Jr.

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

W02-WEST:1ALF1\403933265.2

Attachments: Exhibits 1 – 5

References: Penrod, KC, C Cabanero, C Luke, P Beier, W Spencer, and E Rubin. 2003. South Coast Missing Linkages: A Design for the Tehachapi Connection. Unpublished report. South Coast Wildlands Project, Monrovia, CA. [www.scwildlands.org](http://www.scwildlands.org). URS. 2009. Biota Report for the AV Solar Ranch One Project; Antelope Valley, California. Prepared for AV Solar Ranch 1, LLC. 353 Sacramento St, Suite 2100, San Francisco, CA 94111.

## September 6, 2011 EIR Scoping Meeting Summary

### Los Angeles County General Plan and Antelope Valley Area Plan Updates

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Location: Lancaster Fire Training Station  
Meeting start time: 5:35pm

*Meeting started with presentation by County staff providing information on the purpose of the meeting, describing what an environmental impact report is, the environmental analysis process, and a brief project description.*

#### Questions and/or comments received at the meeting:

- 1) Where can we see the land use maps?  
Response: Online, Lancaster Regional Library, DRP Field Office, 5<sup>th</sup> District Field Office.
- 2) What is the status on the renewable energy map? Is it being kept?  
Response: An email will be sent to the mailing list in the next few days with an update on the renewable energy topic. More information will be provided then.
- 3) Will you keep agricultural zoning?  
Response: Yes, there will still be agricultural zoning.
- 4) If the zoning and land use aren't set, how does the EIR evaluate the impacts?  
Response: Zoning consistency has not yet been completed but the EIR will analyze the land use impacts which can be done with the land use policy map.
- 5) How will we know what changes have been made as new drafts are released?  
Response: We can do a strikeout/underline format.
- 6) People should be informed about ZOUP (Zoning Ordinance Update Program).  
Response: ZOUP is completely separate project from this one and has a different timeline. People should not confuse the zoning efforts contained within this project with ZOUP.
- 7) Confused by the plan, upset about zoning. How will the changes happen?  
Response: The changes go through a hearing process in which public comment is received. The changes do not go into effect until it is adopted by the Board of Supervisors.
- 8) How do you get hard copies of the documents?  
Response: They can be printed off the project website.
- 9) You don't have a tape recorder. Will comments be taken back to staff?

Response: A camera is set up in the corner and video recording the meeting as we speak. County staff is sitting in the back taking notes.

10) Why does the land use map need updating? Without the maps, how do we comment today?

Response: These types of documents generally have a lifespan of 20 years and this one was last adopted 25 years ago so it's out of date. Conditions in the Antelope Valley have changed since 1986 and a new plan is needed to reflect current conditions and desired future. Comments today are to be focused on what needs to be analyzed in the EIR and need to be provided in writing to be included in the formal public comments. If you are not ready to submit comments today, you can still do so until 5:00pm on September 14.

11) Been shown the process but would be helpful to know what the timeframe is. Worried about comment period closing.

Response: NOP comments are due September 14. A comment period will be announced when the EIR is available in the Spring/Summer 2012. Public comment will be taken when public hearings take place before the Regional Planning Commission and Board of Supervisors in Fall/Winter 2012. A "frequently asked questions" page will be placed on the project website to outline public comment periods.

12) What's the field office address?

Response: 335A East Avenue K-6 in Lancaster

13) Renewable energy map is very broad and vague. There are priority zones on that map. How were they determined? What studies were done on each zone? What biological studies were done to determine the area?

Response: The priority zones were based on Competitive Renewable Energy Zones developed by the State Renewable Energy Transmission Initiative. Each zone corresponded to biological data including Significant Ecological Areas (SEA), Swainson's hawk, Mojave ground squirrel, and desert tortoise. There have been studies conducted on the SEAs by the County. The remaining specific species were studied and recommended by the California Department of Fish & Game.

14) General Plan and Antelope Valley Area Plan say "approve carbon sequestering" areas. Will those zones be designated on the map? Concern is that this is blanket approval of all types of carbon sequestration; some types need more analysis.

Response: Not familiar with what part of the plan says that but do not believe there will be mapped carbon sequestering areas.

15) Where you say "project" do you mean a specific project?

Response: No, it refers to the Antelope Valley Area Plan Update which includes the policy document and its accompanying maps.



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

## Memorandum

**Date:** August 17, 2011  
**To:** All Reviewing Agencies  
**From:** Scott Morgan, Director  
**Re:** SCH # 2011081042  
General Plan Update and Antelope Valley Area Plan Update

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The State Clearinghouse is forwarding the attached material from the Lead Agency regarding some additional information for the above-mentioned document. All other project information remains the same.

cc: Connie Chung  
Los Angeles County  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012

AUG 22 2011

SN# 2011081042



Los Angeles County  
Department of Regional Planning

*Planning for the Challenges Ahead*



Richard J. Bruckner  
Director

RECEIVED  
AUG 17 2011  
STATE CLEARING HOUSE

August 15, 2011

TO: State Clearinghouse, Responsible and Trustee Agencies, and Interested Individuals

FROM: Connie Chung, AICP  
Supervising Regional Planner  
Housing Section 

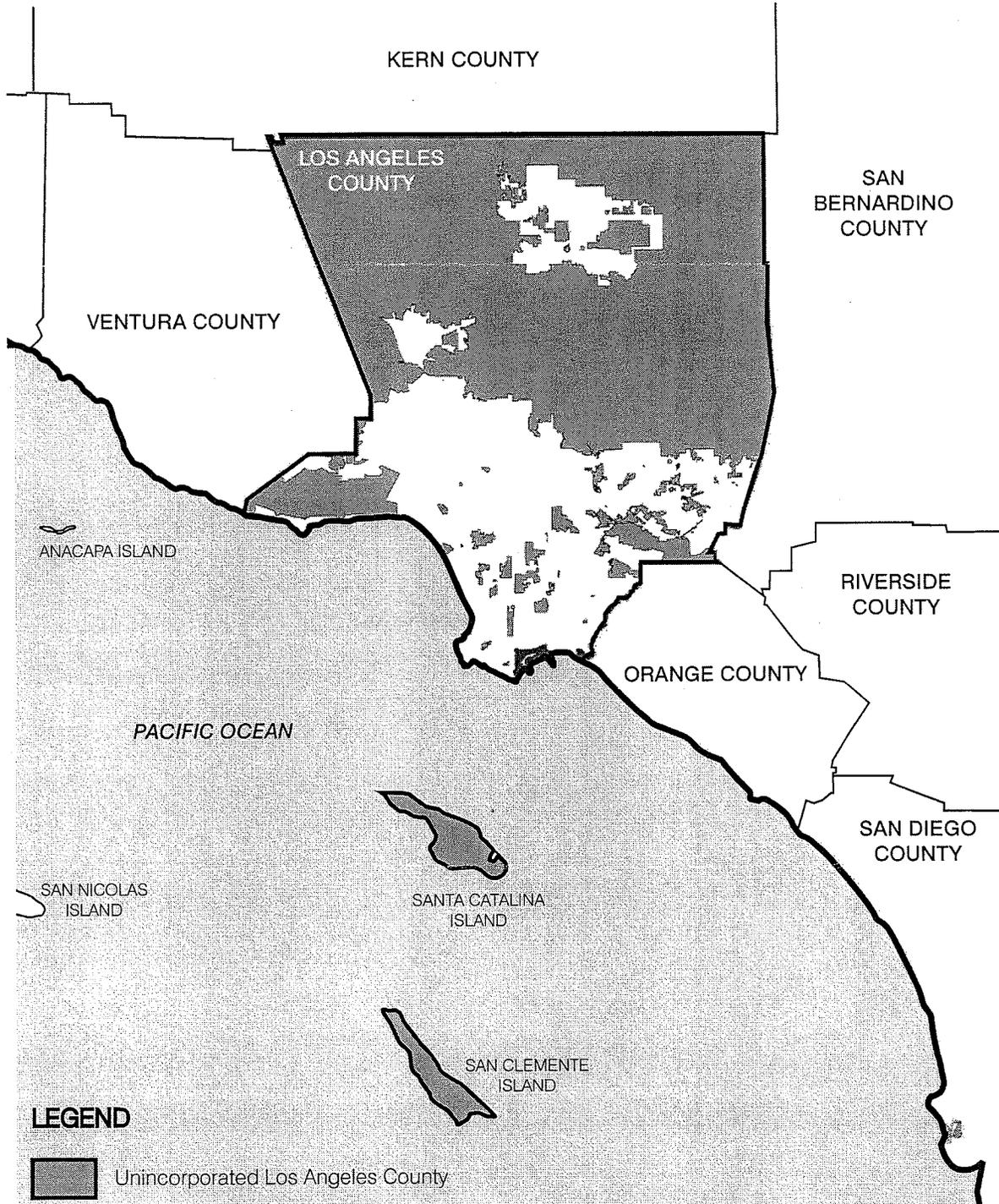
SUBJECT: LOS ANGELES COUNTY GENERAL PLAN AND ANTELOPE VALLEY AREA PLAN UPDATES; NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETINGS

The enclosed map was inadvertently omitted from the Notice of Preparation (NOP) mailed to you on Friday, August 11, 2011. As described in the NOP, the project applies to the unincorporated areas of Los Angeles County. Figure 1 is provided to illustrate the project's locational context.

If you have any questions, please contact Connie Chung at (213) 974-6417 or Thuy Hua at (213) 974-6476.

CC

# Regional Location



Source: Los Angeles County Department of Regional Planning 2011

Los Angeles County General Plan Update  
and Antelope Valley Area Plan Update

The Planning Center | DC&E • Figure 1

Resources Agency

Resources Agency  
Nadell Gayou

Dept. of Boating & Waterways

Mike Sotelo

California Coastal Commission

Elizabeth A. Fuchs

Colorado River Board

Gerald R. Zimmerman

Dept. of Conservation

Jonathan Martis

California Energy Commission

Eric Knight

Cal Fire

Allen Robertson

Central Valley Flood Protection Board

James Herota

Office of Historic Preservation

Ron Parsons

Dept of Parks & Recreation

Environmental Stewardship Section

California Department of Resources, Recycling & Recovery

Sue O'Leary

S.F. Bay Conservation & Dev't. Comm.

Steve McAdam

Dept. of Water Resources

Resources Agency  
Nadell Gayou

Conservancy

fish and Game

Dept. of Fish & Game  
Scott Flint  
Environmental Services Division

Fish & Game Region 1  
Donald Koch

Fish & Game Region 1E  
Laurie Harnsberger

Fish & Game Region 2  
Jeff Drongesen

Fish & Game Region 3  
Charles Armor

Fish & Game Region 4  
Julie Vance

Fish & Game Region 5  
Leslie Newton-Reed  
Habitat Conservation Program

Fish & Game Region 6  
Gebrina Gatchel  
Habitat Conservation Program

Fish & Game Region 6 I/M  
Brad Henderson  
Inyo/Mono, Habitat Conservation Program

Dept. of Fish & Game M  
George Isaac  
Marine Region

Other Departments

Food & Agriculture  
Steve Shaffer  
Dept. of Food and Agriculture

Dept. of General Services  
Public School Construction

Dept. of General Services  
Anna Garbeff  
Environmental Services Section

Dept. of Public Health  
Bridgette Binning  
Dept. of Health/Drinking Water

Independent Commissions, Boards

Delta Protection Commission  
Linda Flack

Cal EMA (Emergency Management Agency)  
Dennis Castrillo

Governor's Office of Planning & Research  
State Clearinghouse

Native American Heritage Comm.  
Debbie Treadway

Public Utilities Commission  
Leo Wong

Santa Monica Bay Restoration  
Guangyu Wang

State Lands Commission  
Cy R. Oggins

Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

Business, Trans & Housing

Caltrans - Division of Aeronautics  
Philip Crimmins

Caltrans - Planning  
Terri Pencovic

California Highway Patrol  
Scott Loetscher  
Office of Special Projects

Housing & Community Development  
CEQA Coordinator  
Housing Policy Division

Dept. of Transportation

Caltrans, District 1  
Rex Jackman

Caltrans, District 2  
Marcelino Gonzalez

Caltrans, District 3  
Bruce de Terra

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David Murray

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Michael Navarro

Caltrans, District 7  
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Dan Kopulsky

Caltrans, District 9  
Gayle Rosander

Caltrans, District 10  
Tom Dumas

Caltrans, District 11  
Jacob Armstrong

Caltrans, District 12  
Marlon Regisford

Cal EPA

Air Resources Board

Airport Projects  
Jim Lerner

Transportation Projects  
Douglas Ito

Industrial Projects  
Mike Tollstrup

State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance

State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

State Water Resources Control Board  
Phil Crader  
Division of Water Rights

Dept. of Toxic Substances Control  
CEQA Tracking Center

Department of Pesticide Regulation  
CEQA Coordinator

RWQCB 1  
Caitleen Hudson  
North Coast Region (1)

RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)

RWQCB 3  
Central Coast Region (3)

RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)

RWQCB 5S  
Central Valley Region (5)

RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office

RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office

RWQCB 6  
Lahontan Region (6)

RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office

RWQCB 7  
Colorado River Basin Region (7)

RWQCB 8  
Santa Ana Region (8)

RWQCB 9  
San Diego Region (9)

Other



STATE OF CALIFORNIA  
 Governor's Office of Planning and Research  
 State Clearinghouse and Planning Unit

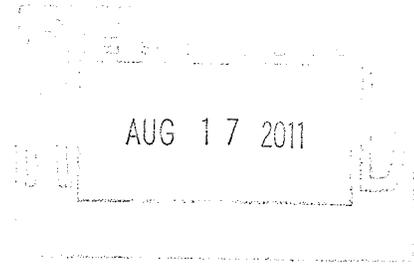


Edmund G. Brown Jr.  
 Governor

Ken Alex  
 Director

Notice of Preparation

August 12, 2011



To: Reviewing Agencies  
 Re: General Plan Update and Antelope Valley Area Plan Update  
 SCH# 2011081042

Attached for your review and comment is the Notice of Preparation (NOP) for the General Plan Update and Antelope Valley Area Plan Update draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Connie Chung**  
 Los Angeles County  
 320 W. Temple Street, Room 1356  
 Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
 Director, State Clearinghouse

Attachments  
 cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2011081042  
**Project Title** General Plan Update and Antelope Valley Area Plan Update  
**Lead Agency** Los Angeles County

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**Type** **NOP** Notice of Preparation

**Description** The project is a comprehensive update of the Los Angeles County General Plan and the Antelope Valley Area Plan. The project includes goals, policies, implementing programs and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update and Antelope Valley Area Plan Update focus growth in the unincorporated areas with access to services and infrastructure and reduce the potential for growth in the County's environmentally sensitive and hazardous areas. The project will replace the adopted General Plan (excluding the Housing Element, adopted in 2008) and the adopted Antelope Valley Area Plan.

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**Lead Agency Contact**

**Name** Connie Chung  
**Agency** Los Angeles County  
**Phone** (213) 974-6417 **Fax**  
**email**  
**Address** 320 W. Temple Street, Room 1356  
**City** Los Angeles **State** CA **Zip** 90012

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**Project Location**

**County** Los Angeles  
**City** Los Angeles, City of  
**Region**  
**Cross Streets**  
**Lat / Long**  
**Parcel No.**  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways**  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use** N/A

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**Project Issues**

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**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Parks and Recreation; Office of Emergency Management Agency, California; Department of Fish and Game, Region 5; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Department of Housing and Community Development; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Regional Water Quality Control Bd., Region 6 (Victorville)

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**Date Received** 08/12/2011 **Start of Review** 08/12/2011 **End of Review** 09/12/2011

- Resources Agency  
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- Dept. of Toxic Substances Control  
CEQA Tracking Center
- Department of Pesticide Regulation  
CEQA Coordinator
- Other

Regional Water Quality Control Board (RWQCB)

- RWQCB 1  
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