ATTACHMENT 1

LOS ANGELES COUNTY

INTERDEPARTMENTAL ENGINEERING COMMITTEE

NOTICE OF PUBLIC MEETING

March 3, 2014

SUBJECT: PROPOSED CHANGES TO THE MASTER PLAN OF HIGHWAYS AS PART OF THE GENERAL PLAN UPDATE

On March 3, 2014, the Los Angeles County Interdepartmental Engineering Committee (IEC) will conduct a public meeting at the time and place below to discuss Project No. 02-305 (1-5), the General Plan Update. The IEC will discuss the following proposed changes to the Highway Plan as part of the General Plan Update:

- Delete Potrero Canyon Road as a Major Highway between SR-126 and Long Canyon Road.
- Downgrade Long Canyon Road from a Major Highway to a Secondary Highway between the Landmark Village area and Magic Mountain Parkway.

The General Plan Update includes several changes to the Master Plan of Highways throughout the unincorporated areas of Los Angeles County. The proposed Master Plan of Highways can be viewed at the following link: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_7-3_hwy_plan.pdf. The proposed Master Plan of Highways can also be viewed in greater detail on GP-NET, which can be accessed at the following link: http://planning.lacounty.gov/generalplan/maps.

The IEC will discuss these proposed amendments in order to provide a recommendation to the Regional Planning Commission.

More information on the General Plan Update is available at the following link: http://planning.lacounty.gov/generalplan.

Meeting Date: **March 3, 2014**

Meeting Time: **3:30 p.m.**

Meeting Place: **Department of Regional Planning**

320 W. Temple St., 13th Floor, Room 1385

Los Angeles, CA 90012

IEC is comprised of representatives of the Los Angeles County Departments of Public Works and Regional Planning, and makes recommendations to the Regional Planning Commission and the Board of Supervisors on highway-related issues.

Any persons having an interest in this matter may attend the meeting and comment. For further information, contact Connie Chung of the Department of Regional Planning at (213) 974-6417 between 7:30 a.m. and 5:30 p.m., Monday through Thursday.

LOS ANGELES COUNTY

INTERDEPARTMENTAL ENGINEERING COMMITTEE

AGENDA

County of Los Angeles
Department of Public Works
Department of Regional Planning

Meeting Place: Department of Regional Planning
320 W. Temple St., 13th Floor
Room 1385
Los Angeles, CA 90012

Meeting Date: March 3, 2014

Meeting Time: 3:30 pm

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1. Project No. 02-305 (1-5) (C. Chung)

   General Plan Update

   A discussion of the following proposed changes to the Master Plan of Highways as part of the General Plan Update:

   - Delete Potrero Canyon Road as a Major Highway between SR-126 and Long Canyon Road.

   - Downgrade Long Canyon Road from a Major Highway to a Secondary Highway between the Landmark Village area and Magic Mountain Parkway.

For further information, contact Connie Chung of the Department of Regional Planning at (213) 974-6417, between 7:30 a.m. and 5:30 p.m., Monday through Thursday.

INTERDEPARTMENTAL ENGINEERING COMMITTEE
MINUTES

County of Los Angeles
Department of Public Works
Department of Regional Planning

Meeting Place: Room 1385
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Meeting Date: March 3, 2014
Meeting Time: 3:30 p.m.

DEPARTMENT REPRESENTATIVES PRESENT

Julian Garcia, Department of Public Works
Samuel Dea, Department of Regional Planning
Connie Chung, Department of Regional Planning
Mark Child, Department of Regional Planning
Susan Tae, Department of Regional Planning
Leon Freeman, Department of Regional Planning
Steven Jones, Department of Regional Planning

DISCUSSION - DRAFT

1. Project No. 02-305-(1-5) (C. Chung)
Los Angeles County General Plan Update

The IEC discussed deleting Potrero Canyon Road between State Route 126 and Long Canyon Road. Additionally, the IEC discussed downgrading Long Canyon Road from State Route 126 and Magic Mountain Parkway from a proposed major highway to a proposed secondary highway, with the westernmost point on Legacy Village as the limit of the downgrade.

ACTION: IEC recommends the approval of the additional proposed amendments to the Highway Plan for the General Plan Update.

For further information, contact Connie Chung, Department of Regional Planning at (213) 974-6417 between 7:30 AM and 5:30 PM, Monday through Thursday.

CC:LF

ATTACHMENT 2

California Native Plant Society

Los Angeles / Santa Monica Mts. Chapter

3908 Mandeville Canyon Road
Los Angeles, California 90049
February 3, 2014

Los Angeles County
Department of Regional Planning
General Plan Development Section
320 W. Temple Street
Los Angeles, CA 90012
Phone: 213-974-6417
Fax: 213-626-0434
General Plan <genplan@planning.lacounty.gov>
Emma Howard <ehoward@planning.lacounty.gov>

RE: Comments on Los Angeles County General Plan Public Review Draft: Chapter 9 and Appendix E

Dear Staff:

The Los Angeles / Santa Monica Mountains Chapter of the California Native Plant Society has 450 members in Los Angeles, San Fernando Valley and Santa Monica Mountains.

We are very interested in the progress of the General Plan, especially in Chapter 9: Conservation and Natural Resources Element, and in Appendix E: Significant Ecological Areas.

Here are some comments on Chapter 9:

1) P. 123, Goal C/Nr 1: Open Space areas that meet diverse needs of LA County: Open Space Acquisition:

a. Policy C/NR 1.4: After ñCreateò add ñsupport and protectò

b. Policy C/NR 1.5: Add to sentence: ñexcept in those areas containing listed flora and fauna, locally rare habitats, or threatened watershed resources.ò

2) P.124, III Biological Resources,

a. Introduction: second paragraph: There are at least nine main types of biological resources. Change ñsixò to ñnineò and add ñchaparral, desert shrubland, and alpineò.

b. Background: Regional Habitat Linkages, second bullet: Add ñto the Tehachapi and San Gabriel Mountains.ò

3.) Pages 125-127, after Fig. 9.2: Regional Habitat Linkages Map are listed descriptions and locations of the previously listed habitats. Please add to this list descriptions and locations of chaparral, desert shrublands, and alpine habitats. For example, most of the SEAs have significant chaparral habitat, Joshua Tree has desert shrublands, as do most of the Antelope Valley areas, and alpine habitat includes high altitude, treeless areas such as the pebble plains of the San Gabriel Mountains.

California Native Plant Society, Los Angeles / Santa Monica Mountains Chapter comments (continued)

4.) P. 130, Goals and Policies for Biological Resources: Goal C/NR 3: Add after ñ...including: habitat linkages, *alpine habitat, chaparral, desert shrublands*,...ò

a. Protection of biological resources: Policy C/NR 3: Add ñchaparral and desert shrublandsò.

b. Site sensitive design: Policy C/NR 3.10: Add to end of sentence: ñwithout negative impact to in situ native habitat.ò

5.) P. 131, Add Goal C/NR 5: Preserve and restore watershed resources that conserve local water supplies and sustain groundwater levels.

6.) P. 131 Policy C/NR 5.1: Preserve and conserve chaparral and shrubland habitat native to each watershed location.

There will be more comments to follow.

Thank you for your consideration of these comments.

Sincerely,

Betsey Landis

Betsey Landis
Conservation Committee
Los Angeles / Santa Monica Mountains Chapter
California Native Plant Society

Leon Freeman

From: Jacki Ayer [airspecial@aol.com]
Sent: Wednesday, February 19, 2014 11:06 AM
To: DRP General Plan Project
Cc: tuckertwo@hughes.net; Katherine.Tucker@ngc.com; m_r_hughes@earthlink.net; rjactontowncncl@aol.com; blumranch@aol.com; thorx655@earthlink.net
Subject: Comments on the Draft General Plan
Attachments: comments on the draft general plan.pdf

Follow Up Flag: Follow up
Flag Status: Completed

To the planning staff In the Department of Regional Planning:

Please accept these timely submitted comments and concerns regarding the Draft General Plan. Please do not hesitate to contact me at AirSpecial@aol.com if you have any questions or comments.

Sincerely
Jacqueline Ayer
Acton resident

Los Angeles County Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012
Phone: 213-974-6417
Fax: 213-626-0434
genplan@planning.lacounty.gov

February 19, 2014

Subject: Comments on the Draft General Plan and Its Long Term Implications for Rural Communities like Acton.

Reference: Draft General Plan Dated January, 2014
Planning Commission Hearing Scheduled February 26, 2014

Enclosed please find my comments on the draft General Plan. In particular, they address the extent to which it protects and preserves rural equestrian communities like Acton.

As a preliminary comment, I am particularly troubled that the draft General Plan fails to identify the intrinsic characteristics that make a community "rural" and, by extension, it fails to establish meaningful goals and policies to protect these "rural" characteristics. To the contrary, it offers two vaguely worded policies about protecting "rural communities" and preserving "rural character" without addressing how "rural character" will be preserved or even what "rural character" actually is. The Land Use Implementation Program is particularly deficient in this regard; while it specifically discourages "incompatible development" in rural communities, it fails to provide any insight into what "compatible" rural development actually looks like. The Draft General Plan therefore lacks the foundational elements essential to any determination of what constitutes "compatible" rural development (and, by extension, "incompatible" rural development). Simply put, the rural protection policies offered in the Draft General Plan are not founded on a clear understanding of what constitutes "rural", and will therefore have no weight or effect.

The draft General Plan constitutes a significant departure from the existing General Plan, which

- Specifically defines "rural communities" as dispersed developments that lack urban infrastructure and *which are intended to remain so*, and
- Sets forth specific policies that avoid intensive development and constrain new development to match the density and intensity of the surrounding area and ensure new developments in rural communities do not cause, or rely on, the expansion of existing infrastructure.

All of this is eliminated in the draft General Plan, which presents a fundamental "paradigm shift" in how rural communities are perceived by Los Angeles County Planning staff, and, more to the point, how they will be "managed" in the future.

In the existing General Plan, rural communities are described as:

> "Non-Urban lands primarily include mountain, foothill, and high desert areas of the County, not currently planned for urban use or scheduled to receive an urban level of service. The intent of this classification is to maintain the character of dispersed non-urban settlements and communities; provide for agricultural and mineral production, preserve areas of significant natural and scenic resources; and avoid intensive development of areas subject to sever natural hazards or lacking essential services and facilities"

The specific policies set forth in the existing General Plan to protect this "rural community" vision are all but eliminated in the draft General Plan. For instance:

Existing General Plan Policy 23 (page I-21): "Ensure that development in non-urban areas is compatible with rural lifestyles, does not necessitate expansion of urban service systems and does not cause significant negative environmental impacts or subject people and property to serious hazards". This policy specifically precludes the development of any commercial or residential projects which cause the expansion of urban service systems in rural communities (including traffic signals, street profiles/lights, etc.). It also precludes intense commercial development along established equestrian trails and in pedestrian areas (such as near schools) that would subject people to serious hazards. Not only does the proposed General Plan eliminate this substantial and protective policy, it establishes the contrary principal that limited infrastructure (such as exists in rural communities) constitutes an ongoing "deficiency" which must be addressed. For instance, page 16 of the draft General Plan states: "The General Plan establishes policies and programs to address existing deficiencies in community services and infrastructure, and to ensure the provision of sufficient community services and infrastructure for new developments". The draft General Plan fails to grasp the simple truth that limited infrastructure is precisely the thing that will preserve rural communities like Acton that wish to remain rural.

Existing General Plan Land Use Policy 9: "Promote neighborhood commercial facilities which provide convenience, goods and services and complement the community character through appropriate scale, design and locational controls." The Draft General Plan completely eliminates the concept (so critical to rural communities) that the location, scale, and design for new neighborhood commercial development should be informed and guided by the character of the surrounding area [1,2]. In its place, the Draft General Plan merely establishes a FAR which is so absurdly high that it ensures only high density/high intensity commercial development in Acton (see attached for more details).

Existing General Plan Land Use Policy 7: "Assure that new development is compatible with the natural and man made environment by implementing appropriate locational controls and high quality design standards". The Draft General Plan eliminates this policy, and replaces it with LU 6.7: "Protect rural communities from the encroachment of incompatible development". This policy is presented by the Draft General Plan as a perfunctory statement that is not explained, discussed or even addressed anywhere in the document; as such, it provides no protection at all for rural communities.

Existing General Plan Land Use Element Policy 8: "Protect the character of residential neighborhoods by preventing the intrusion of incompatible uses that would cause environmental degradation such as excessive noise and traffic". This policy is completely eliminated in the draft General Plan and not replaced with any commensurate policy. In fact, the draft General Plan does

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[1] It is true that, under the Draft General Plan, Policy LU 9.3 requires the scale and design of new and remodeled buildings to "Consider the built environment of the surrounding area", but this policy is entirely focused solely on the building "appearance"; it does not address locational controls necessary to the determination of whether a proposed commercial project is properly sited. For example, the existing General Plan compelled DRP to consider the appropriateness of locating the high density, high intensity "Panda Project" (generating 4,382 vehicle trips per day) adjacent to the High Desert Middle School in Acton. These "locational controls" are eliminated in the Draft General Plan.

[2] The analysis presented herein is based on the assumption that commercial developments in Acton are designated as "Community Commercial [C]", which consistent with the Antelope Valley Areawide Plan.

not contain a single land use policy that seeks to protect rural residential communities like Acton from excessive traffic resulting from commercial development. To the contrary, the draft General Plan explicitly endorses visitor-serving commercial development in rural communities like Acton which, by definition, will significantly increase traffic loads in our community from the freeway and surrounding highways (see RC [rural commercial] land use description on page 76).

Page III-24: Locally serving commercial and industrial projects should be located so as not to "conflict with established community land use, parking, and circulation patterns". The notion that local commercial projects should constrained so as not to conflict with existing land use patterns is eliminated in the draft General Plan and not replaced with any commensurate policy. In fact, and as noted previously, the draft General Plan does not include any land use policy that protects rural communities like Acton from excessive traffic resulting from commercial development.

Existing General Plan Page III-35: The scale of local service commercial uses in terms of acreage and floor area must be "limited to that which can be justified by local community and neighborhood needs. In most cases, such uses in aggregate should not exceed 10 acres". The draft General Plan completely eliminates the entire concept of limiting local commercial development to that which can be justified by local community needs.

Existing General Plan Page III-36: The overall scale and intensity of local commercial service uses should be "in keeping with the surrounding neighborhood or community setting". The draft General Plan eliminates any requirement limiting the scale and intensity of local commercial development based on the surrounding neighborhood, and replaces it with a high fixed floor ratio which virtually guarantees high intensity, urban-style commercial development in Acton.

Existing General Plan Page III-37: The size and intensity of local commercial projects "should be confined to the extent that anticipated traffic generation does not adversely affect conditions on adjacent streets and highways". This protective policy, which minimizes traffic impacts of local commercial projects by limiting the intensity of the project itself, is replaced in the draft General Plan by policies which facilitate intense commercial development by requiring road improvements to accommodate higher traffic loads. These policies will result in high intensity commercial development and heavy traffic loads in Acton,

Existing General Plan Land use Policy Map Notes state that the rural (non-urban) land use designation is assigned to "Areas not currently planned for urban use or scheduled to receive an urban level of service" and within Non-Urban areas, rural residential and certain other uses are permitted subject to established density, design, and service standards. The draft General Plan completely eliminates the concept of limiting growth in rural areas based on existing service standards. Worse yet, it replaces this principal with one which actually requires expansion of public services to facilitate growth (see page 16).

The attached presents additional comments/concerns regarding specific provisions of the draft General Plan. Please give these issues due consideration and revise the draft General Plan accordingly.

Sincerely,

Jacqueline Ayer,
Acton resident

ATTACHMENT – COMMENTS ON THE DRAFT GENERAL PLAN

1. On Page 16, under "Guiding Principles", the draft General Plan states:

"The General Plan implements smart growth by using strategies that are tailored to each community. Strategies, such as transit-oriented development, will create vibrant centers around transit stations that promote neighborhoods where people can live, work, and shop without the need to drive to each Destination. Another smart growth strategy is to facilitate the creation of vibrant and active corridors that connect major centers and destinations, and thriving neighborhood centers within the unincorporated areas. These work in conjunction with other smart growth strategies to "green" streets and buildings, and protect and conserve its natural resources."

Acton has a Metrolink transit station, and the freeway and highways in Acton that connect Santa Clarita with Palmdale clearly constitute a "corridor that connects major centers". Acton is therefore (and without doubt) an obvious candidate for the high density residential development and high intensity commercial/mixed use development that is enthusiastically supported in, and explicitly advanced by, the draft General Plan. If this paragraph is not revised, it is certain that, shortly after the General Plan is adopted, someone will propose an intense commercial or mixed use development in Acton and claim (correctly) that such development is necessary and appropriate because it specifically advances this foundational "smart growth" strategy which essentially underlies the entire General Plan. And there is ***nothing*** in the draft General Plan that can be used to counter this position. In fact, DRP would be remiss in not approving such development, because doing so would be contrary to the foundational strategy of the entire Land Use Element. This, in combination with the excessively high commercial developmental densities (FAR = 0.5) authorized by the draft General Plan, virtually guarantees high density, high intensity development in Acton. To be clear, this Draft General Plan advocates and encourages commercial developments in Acton that have intensities which are *several times greater* than the "Panda project" (which, incidentally, had a FAR of only 0.14).

While this description of "smart growth" may be applicable to urban and suburban communities, it is NOT applicable to rural communities, and the draft General Plan errs substantially in not making this distinction. Therefore, it is unacceptable to the community of Acton. This paragraph must be revised to explicitly exclude rural communities from any consideration as "vibrant" transit centers or corridors. The following revision is recommended: "The General Plan implements smart growth by using strategies that are tailored to each community. Strategies, such as transit-oriented development <u>in urban and suburban areas</u>, will create vibrant centers around transit stations that promote neighborhoods where people can live, work, and shop without the need to drive to each destination. Another smart growth strategy is to facilitate the creation of vibrant and active corridors <u>in urban and suburban areas</u> that connect major centers and destinations, and thriving neighborhood centers within the unincorporated areas…."

2. On Page 16, under "Guiding Principles", the draft General Plan states:
"Community services and infrastructure serve as the backbone of a community. Quality of life is dependent upon the quality and availability of schools, parks, libraries, police and fire services, cultural facilities, and community gathering places; as well as circulation systems, water, sewers, flood control, utilities, communication, and waste management. Successful land use planning and growth management rely on the orderly and efficient planning of community services and

infrastructure. The key to growth management is the commitment to proactively coordinate with public and private partners to provide and maintain sufficient services and infrastructure that are commensurate with growth. The General Plan establishes policies and programs to address existing deficiencies in community services and infrastructure, and to ensure the provision of sufficient community services and infrastructure for new developments."

This paragraph is troublesome. Acton's ability to retain its rural character in the future will hinge directly on whether or not it will continue to have only limited access to community services and infrastructure. In other words, it is precisely the deficiencies in Acton's community services and infrastructure which secure our rural lifestyle. Contrary to what the draft General Plan states, the key to growth management in rural communities that wish to remain rural is to ***limit*** community services and infrastructure in a manner that constrains development and growth (especially "smart growth"). To be clear, a General Plan that is determined to address "existing deficiencies" in rural services and infrastructure is also a General Plan that is determined to ultimately change the rural profile itself. There is no getting around the fact that the application of this "guiding principal" to the rural community of Acton assures its destruction, not its preservation. This paragraph must be revised to address this concern.

3. On Page 17, the draft General Plan states "Los Angeles County as a whole is urbanized…." This statement is completely false; Less than 1/3 of the entire county is urbanized; most of it is rural/open space. More importantly, nearly all the land that is specifically addressed by the Land Use Element (more than 90%) is designated either rural or natural resource (See Table 6.1). As such, the emphasis that the draft General Plan places on urban form and urban-style "smart growth" is completely inappropriate.

4. On Page 17, the draft General Plan states:

"The General Plan also includes goals, policies and programs to minimize risks and discourage development in areas that are prone to safety hazards, such as earthquakes, floods and wildfires."

It is noted that the entire county is prone to earthquakes and floods, and much of the county is subject to wildfires (including urban and suburban areas). Hundreds of thousands of homes have been built in earthquake-prone areas of Los Angeles County (take Northridge for example) and in fire-prone areas as well. It therefore seems unreasonable and improper to cite earthquake or fire concerns as a reason to "discourage" a property owner in Acton from building a home. Also, what exactly is meant by "discourage development" in earthquake, flood, and wildfire prone areas? Do you intend to withhold building permits from Acton property owners merely because Acton (like the rest of Los Angeles County) is earthquake prone?

5. Why are there no "Opportunity Area Maps" identified for the Santa Clarita Valley area? The Draft General Plan states (on page 49) that this area is one of the fastest growing areas in unincorporated LA County with 33,500 housing units approved just in the last 10 years. Yet, incredibly, no "Opportunity Maps" are presented for this area. This is particularly surprising, given the fact that the draft General Plan presents "Opportunity Maps" for limited growth areas like Acton.

6. On Page 62, the Draft General Plan states:

"Density Controlled Design, Natural Resource Conservation, and Hazard Mitigation. Density controlled subdivision design allows buildings to locate closer together on a smaller portion of land so that larger, contiguous natural resource areas may be conserved in a cohesive manner. Density controlled design can also mitigate the exposure of residential uses to hazards, such as wildfires, through the siting and design of open space."

"Density Controlled Design" is simply the new term for "clustering". The community of Acton has, for the last 10 years, made it clear to Regional Planning that it opposes "clustering" in Acton because it provides developers with the means of avoiding the Acton's minimum lot size standards. Virtually every large subdivision map that Regional Planning has reviewed in Acton over the last 20 years has failed to meet Acton's 2-acre minimum lot size requirements, yet they are approved anyway. Land Use Policies intended to further "Density Controlled Design" goals without regard for, and even at the price of, Acton's community development standards is insupportable and must be revised accordingly.

7. On Page 63, the Draft General Plan states

"The Zoning Map is required to be consistent with the General Plan Land Use Policy Map", and Table 6.2 identifies Rural land use designations which are limited to "Single family residences; equestrian and limited animal uses; and limited agricultural and related activities".

Over the last 15 years, DRP has routinely approved high density commercial/industrial projects on rural, N1 and N2 parcels that do not have commercial land use designations in the proposed Land Use Map (see Appendix A of the draft General Plan: sheet 3 of the Antelope Valley Land Use Map). These uses are not single family residences, nor are they equestrian or limited animal uses, nor are they limited agricultural/related activities. Therefore, they do not comply with the Rural Land Use designations identified in Table 6.2. Please address this General Plan inconsistency.

8. Please make the following change to page 68:

Transit Oriented Development
Urban and suburban ~~A~~ areas with access to major transit and commercial corridors have the most potential for infill development. Transit-oriented development is well-suited for higher density housing and mixed uses, and commercial and civic activities. Transit-oriented development connects neighborhoods, and community and employment centers through a broad network of pedestrian, bicycle, transit, and roadway facilities.

Without this change, the community of Acton (which is bisected by a freeway, 3 major highways and has its own train station) is deemed well-suited to Transit Oriented development.

9. Page 70 states:

"The Impacts of Sprawl
Sprawl is a low-density land use pattern that extends development into greenfields and other undeveloped lands with limited or no infrastructure and transit options. A sprawling land use

pattern puts the unincorporated areas at risk of losing resources, such as agricultural lands, and will contribute to the fragmentation and isolation of open space areas. In addition, as sprawl is commonly located in areas with limited or no transit options, continuing this land use pattern contributes to traffic congestion, air pollution, and greenhouse gas emissions."

Development in rural communities such as Acton has, by definition "a low density land use pattern" which extends into "undeveloped lands with limited or no infrastructure". This paragraph clearly and explicitly disparages rural communities to such an extent that it seems to actively discourage their continued existence. The County cannot have it both ways; Either rural development and rural communities are to be encouraged and preserved so that they continue to thrive, or they are to be discouraged and ultimately eliminated. Please revise this provision because it is direct conflict with other sections of the draft GP that are ostensibly intended to preserve rural development.

10. Please make the following change on page 71:

"Community design in rural areas in the Antelope Valley ~~could be~~ is different from community design in urbanized communities, such as East Los Angeles and Florence-Firestone."

11. Pages 71-72 state:

"Community design does not focus on the architectural style of a specific building or site, but rather groups of related elements and uses that when taken together, define a community. Community design considers the adjacency of building entry and sidewalk, the scale of new buildings relative to neighboring structures, and the relationship of the street to the sidewalk. Other examples include designing neighborhood gateways, streetscape improvements on a commercial corridor, consistent landscaping for streets, and uniform signage that can designate a special district within a community. Successful community design standards build upon the characteristics of both the natural and man-made environments that are unique to each community."

This section on "Community Design" is troublesome because none of the examples given (such as "streetscape improvements", "landscaping for streets", "adjacency of building entry and sidewalk", "relationship of the street to the sidewalk", "neighborhood gateways") apply to communities like Acton which, as a rural equestrian community that wishes to remain so (and which has limited water supply), generally opposes sidewalks, streetscape improvements, and street landscaping. The examples of development standards expressed here pertain to urban and suburban communities and are in fact contrary to the standards adopted by rural communities such as Acton. This discussion of "urban community design" should be identified as such, and this entire section should be expanded to include at least one example of a "rural community design" feature.

12. Page 72 states:

"In addition, providing substantial tree canopy cover, and utilizing light colored paving materials and reflective roofing materials, can reduce the urban heat island effect."

The term "reflective roofing materials" is troublesome. Presumably, this term refers to either bright white or shiny (specular reflective) roofing materials. Such roofing materials in rural, low

density rural areas cause significant glare problems for the entire community. Anyone located within ½ mile (or more) of a specular reflective roof in Acton will experience painful glare, often throughout the day. More to the point, non-specular, light colored earth-tone roofing materials favored by Acton coupled with radiant barrier construction is highly energy efficient and successfully meets the EPA's "cool roof" energy efficiency objectives. This section should be revised accordingly.

13. Table 6.2 authorizes a FAR of 0.5 for non-residential uses on rural residential lands [see page 74 of the draft General Plan]. Where did this 0.5 value come from? It is ***exceedingly*** high for a rural area. With this FAR, a 2-acre rural lot is limited to just 1 house, but it can have 43,000 square feet of non-residential structures. How is this reasonable or appropriate?

14. Table 6.2 authorizes a FAR of 0.5 for "Rural commercial" land uses. This high density, high intensity development ratio is ***completely inappropriate*** for the rural community of Acton. DRP is reminded that the high density, high intensity "Panda Project" which was ultimately deemed inappropriate for Acton (and which included 8 fast food restaurants on 2 acres) had a FAR that was only 0.14. As it is currently written, this draft General Plan clearly and specifically authorizes commercial projects in Acton that are *three times more dense/intense* than the Panda Project.

15. According to Table 6.2, commercial uses on "Rural commercial" lands are supposed to be "visitor serving activities". The community of Acton has repeatedly told DRP that we ***do not want*** any commercial development that is intended to serve either visitors or the traveling public because such development causes significant traffic, noise and trash impacts in our community. The intent of Rural Commercial development should be to serve the local (rural) community in which it is located. Period. It is notable that, in urban and suburban areas, DRP specifically restricts commercial uses on "General Commercial" lands to local serving purposes, yet, inexplicably, does not place the same local-serving restrictions on "Rural Commercial" uses. This MUST be revised and corrected in the Final GP

16: The "warehousing and distribution" uses identified for "Light Industrial" land uses are not appropriate for rural communities such as Acton because of the traffic impacts that such uses generate.

17. If the highest residential density allowed on rural lands is 1 du/acre, why is 5 du/acre appropriate for rural mixed use? How is this consistent with a rural profile and why was it even developed?

18. Land Use Element Policy LU 3.2 states "Discourage development in areas with environmental resources and/or safety hazards". Given that the Draft GP designates the entire community of Acton as a "safety hazard" area (Figures 6.1. 12.1 and 12.6), how precisely will DRP discourage development in Acton? What does this statement actually mean for the residents and property owners of Acton?

19. Land Use Element Policy LU 4.1 states "Encourage infill development on vacant, underutilized, and/or brownfield sites". This policy is problematic for rural communities, which have low density development and (by definition) consist entirely of parcels which, from an urban perspective, are either "vacant" or "underutilized" parcels. This policy should be revised to read: "Encourage infill development in urban and suburban areas on vacant, underutilized, and/or brownfield sites.

20. Land Use Element Policy LU 4.3 states: "Encourage transit-oriented development with the appropriate residential density along transit corridors and within station areas". This policy fails to constrain such development to the 11 designated TOD Policy Areas that are explicitly identified in the draft General Plan (see Figure 6.4). Worse yet, it specifically encourages TOD development in rural communities like Acton that have a train station or are located on major highways, even though such development is clearly contrary to preservation of the "rural profile". This policy must be revised to ensure that Acton and other rural communities cannot ever be construed as potential TOD areas; for instance: "Encourage transit-oriented development within designated TOD Policy Areas identified in Figure 6.4 with the appropriate residential density along transit corridors and within station areas". [Incidentally, there is a typographical error on page 69, which indicates that the designated TODs are shown on Figure 6.3; in actuality, they are depicted on Figure 6.4]

21. Land Use Element Policy LU 4.4 states: "Encourage mixed use development along major commercial corridors". As written, this policy is problematic; no map or definition of "major commercial corridor" exists in the draft General Plan. More to the point, since the draft General Plan does not limit its contemplation of "major commercial corridors" to only urban and suburban areas, it could easily be construed to include frontage property in Acton along the 14 freeway and Sierra Highway. This policy must be revised to ensure that it will not be relied upon to facilitate high density mixed use development within Acton in the future. For example: "Encourage mixed use development in urban and suburban areas along major commercial corridors".

22. Under "Community Serving Uses", Land Use Element Policy LU 5.1 states: "Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types and styles". Precisely how is this policy "Community Serving", particularly for rural communities? This policy applies only to urban and suburban areas, and should be clearly designated as such.

23. Under "Community Serving Uses", Land Use Element Policy LU 5.2 states: "Encourage a diversity of commercial and retail services, and public facilities at various scales to meet regional and local needs." This policy is troubling, particularly for rural communities. Commercial and retail development in rural communities should NEVER be intended to serve regional needs. Rather it should be limited in scope, density and intensity to serve local needs ONLY. This policy applies only to urban and suburban areas, and should be clearly designated as such.

24. Land Use Element Policy LU 6.7 states: "Protect rural communities from the encroachment of incompatible development". The General Plan fails to describe or even address what "incompatible development" in rural communities looks like. For the record, "incompatible" residential development in Acton is any residential development having a density in excess of 1

dwelling unit per 2 acres, and "incompatible" non-residential development is any commercial or industrial development that significantly increases local traffic patterns, expands infrastructure, or has a density, intensity, or FAR pattern that exceeds the established profile surrounding the development. This non-specific policy has no strength, depth or breadth, and it lacks all the elements necessary to actually protect rural communities from "incompatible development". This term should be defined in such a way that precludes high density, high intensity, or high traffic development in rural communities such as Acton that wish to remain rural in future.

25. Land Use Element Policy LU 6.9 states "Encourage development in rural areas that is compatible with rural community character, preserves open space, conserves agricultural land, and promotes efficiencies in services and infrastructure." The problem with this policy is that development which "promotes efficiencies in services and infrastructure" is, by definition, compact and dense, and therefore contrary to the low density, low intensity profile of rural communities. This Policy MUST be revised: "Encourage <u>low density, low intensity</u> development in rural areas that is compatible with rural community character, preserves open space, <u>and</u> conserves agricultural land, ~~and promotes efficiencies in services and infrastructure.~~"

26. Land Use Element Policy LU 8.2 states "Encourage patterns of development, such as sidewalks and bikeways that promote physical activity." The use of sidewalks is specifically contrary to Acton's rural/equestrian profile and Community Standards District, which calls for street plans with inverted shoulder construction and no sidewalks. As written, this land use policy conflicts with the rural developments that exists throughout most of the Planning Area, thus it should be revised accordingly.

27. Land Use Policy LU 9.7 seeks to promote "continuity along commercial corridors with transit or active pedestrian activities." What precisely does this policy mean? How precisely will it be implemented in rural equestrian communities such as Acton?

28. Land Use Element Policy LU 9.13 states: "Discourage flag lot subdivisions unless designed to be compatible with the existing neighborhood character". What is wrong with flag lot subdivisions, particularly in rural hillside communities like Acton? Why are they explicitly targeted for elimination? Flag lots are an effective way to preserve hillside areas and, at the same time, comply with Acton's 2 acre minimum lot size. It is also an effective alternative to "clustering", which the community of Acton has actively opposed for the last 10 years. The fact that this draft policy includes a "workaround provision" which allows flag lots if they are compatible with existing neighborhood character is of no consequence, since DRP planning staff automatically discount and routinely ignore such provisions when reviewing small subdivision plans. It is unacceptable for the general plan in simply prohibit this subdivision design tool which is important in rural communities such as Acton without a very compelling reason.

29. Land Use Element Policy LU 10.2 states "Support the design of developments that provide substantial tree canopy cover, and utilize light colored paving materials and reflective roofing materials to reduce the urban heat island effect." As stated clearly above, specular and highly reflective roofing materials are ***the worst possible choice*** within the community of Acton. This fact is undisputed, and it should compel regional planning to revise this policy accordingly.

30. Land Use Element Policy LU 10.6 states: "Ensure that subdivisions in VHFHSZs site open space to minimize fire risks from flammable vegetation". Generally speaking, open space areas created by future subdivisions in VHFHSZs will be located in areas that are covered in native vegetation which is often quite flammable. Indeed, it is precisely the flammable nature of this vegetation which creates the VHFHSZ in the first place. The only way to actually "minimize" fire risks from flammable native vegetation in open space areas in VHFHSZs would be to remove such vegetation which, of course, is contrary to native vegetation protection policies. This policy simply cannot be implemented and should therefore be removed or revised.

31. Land Use Element Policy LU 10.7 states "Encourage the use of density controlled design techniques to conserve natural resource areas." As written, this policy (which advocates "clustered" land developments) is unacceptable to Acton for reasons mentioned previously. At a minimum, it must be revised to secure absolute conformance with community standards pertaining to minimum lot size requirements.

32. Page 93 states: "Figure 7.2 is a map of the Highways and Freeways System that serves Los Angeles County." This statement is inaccurate because Figure 7.2 maps only those state highways/ freeways that are maintained by CalTrans; it does not depict any of the "Major Highways" that serve Acton, including Sierra Highway, Soledad Canyon Road, and the Angeles Forest Highway. This statement should be revised as follows: "Figure 7.2 is a map of the <u>State</u> Highways and Freeways System that serves Los Angeles County".

33. On Page 94, the following description is found: "Limited secondary highways are located in remote foothill, mountain and canyon areas." This description is offensive because Acton (which has several limited secondary highways) is NOT a remote area; it is in fact a designated rural community that is located between two major urbanized regions. This description must be changed as follows: "Limited secondary highways are located in <u>rural communities and</u> remote foothill, mountain and canyon areas".

34. Page 96 states: "Although DPW utilizes the above described LOS criteria for assessing the performance of, and determining impacts to, roadways, DPW is currently working on the development of a multimodal transportation planning function. This effort will ensure that transportation facilities are planned, designed, and maintained to provide safe and efficient mobility for all users, including bicyclists, pedestrians, and motor vehicles." The scope of transportation modes described here as part of DPW's "multimodal transportation planning function" must be broadened to take into consideration equestrian uses that are crucial to Acton. Both the County Code and the State Vehicle Code classify horses as vehicles, and for this reason, DPW has continually and persistently contended that equestrian use of pedestrian areas in Acton is a violation of law. Yet, at the same time, DPW insists that equestrian use of the roadway itself is not appropriate or authorized. To ensure this conflict is properly addressed by the Draft General Plan, this section must be revised to include equestrian uses in the list of transportation issues that will be addressed by DPW's "multimodal transportation planning function".

35. Please make the following revisions to page 98: "Historically, transportation planning and street design have focused on the automobile, resulting in hostile environments for pedestrians<u>,</u>

equestrians, and bicyclists. In order to create safer places to walk, ride and bicycle, as well as to take transit, more emphasis needs to be placed on these other viable modes of transportation. Furthermore, street designs should accommodate all users, including children, seniors, and the disabled. Streets designed to incorporate all potential users, including pedestrians, equestrians, bicyclists, transit users, and conventional vehicular traffic are known as complete streets. Aesthetics and function are also important considerations when creating comfortable places to walk, ride, bicycle, and take transit."

36. Section 2 "Creating a Multimodal Transportaion System" (on page 99) should be expanded to address equestrian issues.

37. Section 3 "Connecting Transportation and Land Use Planning" (beginning on page 99) should be expanded to address equestrian mobility issues to ensure all land use decisions in Acton account for equestrian uses, including the development of feeder trails and backbone trails.

38. Mobility Element Policy M 2.1 should be revised as follows: "Design streets that accommodate pedestrians, equestrians and bicyclists, and reduce motor vehicle accidents through a context-sensitive process that addresses the unique characteristics of urban, suburban, equestrian and rural communities".

39. Mobility Element Policy M 2.7 should be revised as follows: 'Require sidewalks, trails and bikeways to accommodate the existing and projected volume of pedestrian, equestrian and bicycle activity, considering both the paved width and the unobstructed width available for walking."

40. Mobility Element Policy M 2.8 should be revised as follows: "Connect trails and pedestrian and bicycle paths to schools, public transportation, major employment centers, shopping centers, government buildings, residential neighborhoods, and other destinations.

41. Mobility Element Policy M 2.11 should be revised as follows: "In urban and suburban areas, promote the continuity of streets and sidewalks through design features, such as limiting mid-block curb cuts, encouraging access through side streets or alleys, and promoting shorter block lengths." . This recommendation is based on the fact that the traditional street design features described in M2.11 such as sidewalks and streetlights are opposed in rural communities and are in fact contrary to the Acton CSD.

42. Mobility Element Policy M 4.5 should be revised as follows: "Where feasible, encourage continuous, direct routes through a connected system of streets, with small blocks and minimal dead ends (cul-de-sacs)." This policy is infeasible in several areas of Acton.

43. Mobility Element Policy M 5.4 should be revised as follows: "Support and pursue funding for the construction, maintenance and improvement of roadway, public transit, pedestrian, equestrian, and bicycle transportation systems".

44. Mobility Element Policy M 7.5 states "In rural areas, require rural highway and street standards that minimize the width of paving and the placement of curbs, gutters, sidewalks, street lighting, and traffic signals, except where necessary for public safety". The problem with this policy is that it will not successfully protect rural communities such as Acton from inappropriate infrastructure such as curbs, gutters, sidewalks, and streetlights. The fact is, DPW routinely and persistently requires this infrastructure in Acton without any actual showing that it is "necessary for public safety". DPW merely declares that it is, and then requires it to be installed. This policy should be revised to prevent DPW from making such peremptory decisions regarding "necessary street improvements" without first showing that such improvements are indeed "necessary". The following language is recommended: "In rural areas, require rural highway and street standards that minimize the width of paving and the placement of curbs, gutters, sidewalks, street lighting, and traffic signals, except where <u>an engineering study clearly demonstrates that such curbs, sidewalks, and street lighting are indeed</u> necessary for public safety".

45. Air Quality Element Policy AQ 3.5 states: "Encourage maximum amounts of energy conservation in new development and municipal operations". What exactly is "maximum amounts of energy conservation"? Is it really appropriate to pursue "maximum amounts of energy conservation" without regard for cost or impact? For instance, as written, this policy compels the county to deny a permit for any residential construction project that fails to fully offset its entire energy footprint via solar panels merely because such offsets are theoretically possible. This policy should be revised as follows: "Policy AQ 3.5: Encourage ~~maximum amounts of~~ energy conservation in new development and municipal operations."

46. Conservation and Natural Resource Element Policy C/NR 3.10 states: "Require that development mitigate 'in-kind' for unavoidable impacts on biologically sensitive areas—onsite or nearby as feasible, but allow flexible off-site application to the benefit of other County SEAs or connectivity among them if onsite is not feasible, and permanently preserve mitigation sites." What exactly is meant by "in-kind" mitigation? Does it mean that a 4,000 square foot residential development on a 20 acre lot within an Acton SEA must be mitigated by the dedication of 4,0000 square feet of the same lot to "open space" preservation? Or does it mean mitigation by the dedication of a separate 20 acre parcel to "open space" preservation? Or will property owners just be able to pay into a fund that banks mitigation fees that are intended for open space acquisition purposes? For the record, SCE had destroyed hundreds of acres within the proposed "Santa Clara River SEA" without any "in-kind" mitigation.

47. Conservation and Natural Resource Element Policy C/NR 3.11 states: "Discourage new development from increasing the urban-wildland interface in undisturbed natural areas through compact design". Precisely what portions of Acton are considered to be "the urban-wildland interface" where compact design will be implemented?. Compact design is not a policy that is supported by the community of Acton because it has been inappropriately and continually used by DRP to approve subdivisions that do not meet Acton's 2-acre minimum lot size requirement.

48. Conservation and Natural Resource Element Policy C/NR 5.6 states: "Minimize point and non-point source water pollution". How does the County intent to implement this policy vis a vis new residential septic systems in Acton?

49. Figure 9.6 superposes an assumed "county windspeed" profile onto a mineral, oil and gas resource map. This figure is both clumsy and fails to consider current renewable energy generation trends:

a. "Wind" is not a legitimate natural resource, and it is not an important renewable energy source, either. Of the 150 new generation sources that have applied for connection to the California grid in the last 4 years, only 5 are wind projects [Pgs 2-5 of the "CAISO Generation Queue" at http://www.caiso.com/Documents/ISOGeneratorInterconnectionQueue.pdf]. Of the 71 generation projects that have been completed since 1999, only 13 are wind projects [Pgs 6-7]. Nearly 100 wind energy projects proposed for connection to the California grid have been cancelled/withdrawn since 2006. Clearly, "wind" is not a resource in Los Angeles County, and DRP's attempt to show otherwise (by including windspeed profiles in Figure 9.6) is unsupported by the facts.

b. Given the fact that solar generation is much more widespread and has a much higher generation potential than wind, it is very odd that wind is emphasized in Figure 9.6, and solar is completely ignored.

c. Within Acton, utility-scale wind generation projects could only be viable if they are placed along the scenic hillside and ridgelines of this community. Such construction violates the hillside and ridgeline preservation provisions of the Acton CSD. Yet, incredibly, Figure 9.6 depicts these areas as "natural resource areas" that should be exploited for energy generation purposes.

d. The high speed wind "resource" areas depicted in Figure 9.6 are all located in and along steep hillsides which are supposedly inappropriate development areas. DRP cannot and should not tell wind developers that hillside construction is appropriate, and at the same time, tell private property owners that hill side construction is inappropriate.

50. Conservation and Natural Resource Element Policy C/NR 12.1 states "Expand the production and use of renewable energy resources". This statement is particularly troublesome because it advocates the unfettered expansion of renewable energy production without regard for the significant and deleterious impacts that such projects create. Even small (100 MW) renewable energy projects require the clearance of more than 1,000 acres of open space habitat, and they often cause significant visual (even blindingly bright) impacts not to mention excessive water demand. The only type of renewable energy production that should be actively supported without limit is the expansion of photovoltaic generation on existing structures in developed areas. There is sufficient roofspace in the greater Los Angeles area to accommodate urban electrical demand via in-situ generation. This policy MUST be revised to strongly encourage the installation of photovoltaics on existing structures in developed areas and strongly discourage renewable energy projects on undeveloped open space areas.

51. Has the county considered designating the 14 freeway in Acton and Agua Dulce as a scenic highway? If so, what happened? It seems that if the section of the 5 freeway north of the 14 freeway transition qualifies, then the 14 freeway should qualify as well.

52. Many of the ridgelines in Agua Dulce are designated as "significant ridgelines" in Figure 9.8. Why are there no "significant ridgelines" designated in the community of Acton? There are certainly several ridgelines which meet the criteria identified on page 152 of the Draft General Plan.

53. Parks and Recreation Element Policy P/R 3.3 (which seeks the expansion of lighting districts in subdivisions) is in conflict with Acton's goal to minimize "light pollution". Streetlights are strongly discouraged in Acton and many other rural communities, and if they are constructed, they must be fully shielded. This policy must be revised to ensure that it is not improperly applied to subdivisions where streetlighting is actively discouraged.

54. Parks and Recreation Element Policy P/R 4.3 is deficient because it lacks any definitive language regarding how feeder trails will be secured. It must be strengthened to ensure that feeder trail dedications and offers to dedicate are properly secured through the subdivision **and** the land development processes. DRP is reminded that the Acton CSD specifically requires that trails be developed in every land division in Acton. If the county can obtain park land through the subdivision process via the Quimby act, and it can require LLADs as part of the subdivision process and land development process (see Policy P/R 3.3), then it can secure feeder trails for Acton in the same manner.

55. Acton anticipates that, when it is released, the noise contour map (Fig 11.2) will address the significant noise coming from high voltage power lines and substations; this is a significant noise source in the community of Acton.

56. Noise Element Policy N 1.10 states: "Orient residential units away from major noise sources (in conjunction with applicable building codes). Where feasible, exterior walls should have minimal surface openings (i.e. windows, balconies, sliding doors, etc.) not to exceed 10% of the total wall surface". This requirement is far too stringent., and it should only be implemented in areas with significant (>50 dB) ambient noise levels Most areas in Acton do not have significant ambient noise levels, so Acton property owners should not have such a significant restriction placed on them. Moreover, limiting the total surface area openings in a residence to only 10% creates dark interior spaces and prevents homeowners from obtaining full benefit of passive solar design options. It also unduly restricts a homeowner's viewshed by limiting the location and orientation of the windows in the home. Finally, it must be pointed out that this policy is unnecessary, since modern window and door construction methods can eliminate virtually all exterior sound impacts.

57. Safety Element Policy S 3.1 "discourages" development in very high fire hazard severity zones (VHFHSZ). The entire community of Acton is in a VHFHSZ. Specifically in what way will this "discouragement" occur in Acton and how will it affect Acton land owners?

58. Public Services and Facilities Element Policy PS/F 2.1 states "Implement water conservation measures, such as drought tolerant landscaping and restrictions on water used for landscaping." This policy is not discussed or even alluded to anywhere in the entire Public Services and Facilities Element; it simply appears without any supplemental information. Does this policy apply to new developments or existing? Does it apply to property owners on private wells that do not use

municipal water systems? This policy will significantly impact tens of thousands of property owners if it requires the removal and replacement of existing landscapes. This policy should be discussed in detail in the General Plan, and if such discussion is not provided, it should be deleted.

59. Why isn't the Acton-Agua Dulce Library included as a "Library Site" in Figure 13.2?

60. Public Services and Facilities Element Policy PS/F 6.6 should be revised as follows: "Require electrical distribution lines to be constructed underground. Encourage the construction of electrical transmission utilities underground, where feasible." Placing electrical distribution lines underground will significantly reduce fire risks, particularly in VHFHSZs. It will also reduce the severity of vehicular accidents along rural highways and roads.

61. Economic Development Element Policy ED 4.4 should be revised as follows: "Incentivize urban and suburban infill development that revitalizes underutilized commercial and industrial areas." Such incentives are not appropriate for rural communities which, by definition, have dispersed, low density commercial development that, from an urban perspective, is intrinsically "underutilized".

62. Economic Development Element Policy ED 4.6 should be revised as follows: "Retrofit and reuse vacant and underutilized industrial and commercial sites in urban and suburban areas for emerging and targeted industries". This policy is inappropriate for rural communities for reasons mentioned above (Item 61).

63. Page 136 states "In rural areas, hundreds of households depend solely on private wells that tap into local ground water sources". This statement is problematic because water extracted from private wells is NOT deemed to come from a "local" source, it comes from a privately-owned "point source". To be clear, private well owners extract privately owned water from privately owned "point sources" which occur on and under their privately owned land. Secondly, this statement significantly understates the number of households that depend on private wells.

64. Program #P/R-2 on Page 261 should be expanded to include a provision for obtaining feeder trail dedications or offers to dedicate from subdivision and development projects in rural equestrian communities to ensure trail connectivity.

Leon Freeman

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

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Chung

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

best regards

clark stevens, architect

executive officer, RCDSMM
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3 February 2014

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

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

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

Dear Ms. Chung,

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

Chapter 3 Guiding Principles

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

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

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

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

adaptive management of the planning process.

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

Chapter 6 Land Use Element

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

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

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

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

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

Chapter 8: Air Quality Element

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

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

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

Chapter 9: Conservation and Natural Resources Element
On page 129, it states that there is no coordinated master plan to acquire, manage and preserve open space in the County. How are private open space easements tracked and monitored?
We agree that a coordinated open space master plan is needed. This could be added as a policy to Goal C/NR 2.

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

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

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

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

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

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

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

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

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

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

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

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

Chapter 10: Parks and Recreation Element
We support the effort to identify small, county owned areas in more densely populated areas that could be restored as parks, local community gardens and open space for local residents.

Chapter 12: Safety Element
The plan should set the stage for zoning in areas with identified geologic, seismic, flood, fire or other natural hazards should be reassigned to open space or lowest possible density use to reduce costs associated with extending development into harms way.

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

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

Chapter 13: Public Services and Facilities Element
We agree that there is a need to effectively track development, and recommend that a review of the policies versus built reality of the 1986 plan be evaluated to identify ways to avoid making the same mistakes, provide insight into what worked or did not work, and set the stage for careful monitoring and development of benchmark metrics to provide annual evaluation of proposed goals and policies.

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

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

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

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

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

Chapter 14: Economic Development Element
Given the need for promoting jobs locally, provide an integrated plan that connects jobs more directly to transportation and housing by clustering makes sense.

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

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

Chapter 15: General Plan Maintenance
The requirement for Annual Progress Reports for each of the major Policy elements is a good way to develop an on-going review of policy implementation and effectiveness.

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

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

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

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

Sincerely,

Clark Stevens
Executive Officer

Leon Freeman

From: serpoe [serpoe@qnet.com]
Sent: Wednesday, February 26, 2014 9:40 AM
To: DRP General Plan Project
Subject: project number: 02-305-(1-5)

Follow Up Flag: Follow up
Flag Status: Flagged

Project Number: 02-305-(1-5)

This is a terrible and totally disruptive idea to those of us making a deliberate choice to live in a rural location. We have chosen to live where we look out our windows and see countryside and all the vegetation and animals inherent to the area. We do not look out our windows and see what the neighbor is doing in his house, which is the case of city living. This is definitely the case of "if it ain't broke, don't fix it. Leave it alone". Please listen to the people who live in the area, have lived in the area, and wish to continue to live in a true rural area.
Thank you, Marilynne Kredo, 7647 Valley Sage Rd, Acton, CA 93510

Freeport-McMoRan Oil & Gas
5640 South Fairfax Avenue
Los Angeles, CA 90056

Telephone: 323-298-2200

February 26, 2014

Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012-3225

VIA HAND DELIVERY

RE: January 2014 Revised Draft General Plan

Dear Members of the Los Angeles County Regional Planning Commission:

As Operator of the Inglewood Oil Field (IOF), Freeport-McMoRan Oil & Gas has reviewed the subject Revised Draft General Plan (RDGP) and appreciates the County's consideration and implementation of many of our comments on the prior versions of the Draft General Plan. Nonetheless, as reflected in this letter, we remain concerned that the proposed General Plan Update must be consistent with the Baldwin Hills Community Standards District (CSD) and our vested rights to continue operations and responsibly develop the mineral rights underlying the surface of the IOF.

The Revised Draft designates surface parcels within the IOF owned by the City of Los Angeles Department of Water and Power (DWP) as Public and Semi Public (P). DWP has the right to use this surface property for operation and maintenance of high-voltage power lines as part of the electric system of the City of Los Angeles subject to the terms of the underlying oil and gas lease further described in that Deed recorded on May 29, 1959 as Document No. 1503 and that Deed recorded 11/7/1946 as Document No. 2403 in the Official Records of Los Angeles County. The proposed P land use designation would interfere with FM O&G's vested and mineral rights by disallowing any new, oilfield activities or uses within this surface area and allowing incompatible uses to in this area – which conflicts with other policies of the RDGP and comprises the security and safety of the IOF. A solution to this issue that would provide consistency throughout the RDGP itself, the CSD, and FM O&G's vested and mineral rights would be to:

1. Include oil and gas production and processing facilities within the purpose of the P land use designation (page 91 of the redlined RDGP);
2. Reinforce that public access to major public facilities, as referenced in the P land use designation description, <u>not</u> be accessible to the public rather than "generally not publicly accessible" as currently drafted in the RDGP (page 91 of the redlined RDGP);
3. Include oil and gas production and processing facilities within Policy PS/F 6.8 (Page 259 of the redlined RDGP as shown in the enclosure to this letter; and,
4. Include oil and gas production and processing facilities to the description/list of "Major Facilities" (page 83 of the redlined RDGP).

For your reference, the enclosure to this letter shows redlined versions of the aforementioned resolutions within the text of the RDGP (numbers within this letter and the enclosure are consistent).

FREEPORT-MCMORAN OIL & GAS

FM O&G also remains concerned with the County's use of the term "conserve and protect" and the requirement to "permanently" preserve mitigation sites. Both of the words, "conserve" and "protect," may be interpreted as "do not touch." The term "permanent" of "permanent preservation" would result in the same interpretation for the area that makes up any mitigation sites. Both scenarios would not allow for flexibility in development in consideration of unique characteristics of any given site in the County, including the IOF. The "permanent preservation" of mitigation sites would also conflict with CSD Section E.7, which was implemented due to implementation of mitigation measures resulting from the thorough analysis of the CSD EIR. This could result in unintended consequences that could unnecessarily impede positive developments and improvements within the County.

Alternatively, if the County implemented the following changes to the RDGP, these issues would not exist:

5. Change the term "conservation and preservation" to "conservation and protection" within the introduction to Chapter 9 (Page 136 of the redlined RDGP) and any other areas where the term may occur in the RDGP; and,
6. Add the text "to the extent feasible" to policy C/NR 3.10 (Page 150 of the redlined RDGP).

Again, the enclosure to this letter shows redlined versions of the aforementioned resolutions within the text of the RDGP (numbers within this letter and the enclosure are consistent).

Thank you in advance for your consideration of the comments and concerns within this letter and the enclosure thereto. Please feel free to contact me should you have any questions.

Sincerely,

Laura Vlk
Senior EH&S Specialist

Cc Steve Rusch, Vice President EH&S and Government Affairs
Stephen Burke, Manager Land
John Martini, Manager EH&S and Government Affairs
Candace Salway, Manager EH&S
Jon Sanabria, County of Los Angeles, Deputy Director
Jill M. Jones, County of Los Angeles, Deputy County Counsel
Connie Chung, County of Los Angeles, Supervising Regional Planner
Leon Freeman, County of Los Angeles, Planner

Freeport-McMoRan Oil & Gas
Requested Changes to the
January, 2014 Los Angeles County Revised Draft General Plan (RDGP)
February 25, 2014

1 and 2: Public and Semi Public (P) Purpose: Page 91 of the redlined RDGP:

….Other major ~~public~~ facilities, including planned facilities that may be public serving but ~~generally~~ not publicly accessible, such as landfills, solid and liquid waste disposal sites, oil and gas production and processing and facilities, multiple use stormwater treatment facilities, and major utilities….

3. Policy PS/F 6.8: Page 259 of the redlined RDGP:

Support the prohibition of public access within, and the limitation of access in areas adjacent to natural gas storage facilities and oil and gas production and processing facilities to minimize trespass and ensure security.

4. Major Facilities Description/List: Page 83 of the redlined RDGP:

Major facilities, such as landfills, solid waste disposal sites, energy facilities, natural gas storage facilities, oil and gas production and processing facilities, military installations, and airports should be protected from the encroachment of incompatible uses.

5. Introduction to Chapter 9: Page 136 of the redlined RDGP:

The County's role in the protection~~,~~ and conservation ~~and preservation~~ of natural resources and open spaces areas is vital as most of the natural resources and open space areas in Los Angeles County are located within the unincorporated area.

6. Policy C/NR 3.10: Page 150 of the redlined RDGP:

Require that development mitigate 'in-kind' for unavoidable impacts biologically sensitive – onsite or nearby as feasible, but allow flexible off-site application to the benefit of other County SEAs of connectivity among them if onsite is not feasible, and permanently preserve mitigation sites to the extent feasible.

WATER RECLAMATION
SOLID WASTE MANAGEMENT

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

February 26, 2014

Ref File No.: 2850754

RECEIVED
MAR 03 2014
BY:

Ms. Connie Chung, AICP, Section Head
General Plan Development & Housing Section
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Chung:

Comprehensive Update of
the Los Angeles County General Plan

This is in reply to your notice, which was received by the County Sanitation Districts of Los Angeles County (Districts) on January 16, 2014. We offer the following comments:

1. The Districts own, operate, and maintain only the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the unincorporated portions of Los Angeles County (County) except to state that presently no deficiencies exist in Districts' facilities that serve the County.

2. The Districts should review individual developments within the County in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.

3. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link for a copy of the Districts' average wastewater generation factors.

4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific

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information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Hyde

Adriana R

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Puente Hills
Habitat Preservation Authority
Endowment Provided by the Puente Hills Landfill

HABITAT AUTHORITY
CELEBRATING 20 Years
Preservation, Restoration, and Education

March 12, 2014

County of Los Angeles
Department of Regional Planning
General Plan Development Section
Attn: Connie Chung, Supervising Regional Planner
Attn: Susan Tae, Supervising Regional Planner
320 West Temple Street
Los Angeles, CA 90012

Comments on Revised Draft Los Angeles County General Plan 2035 (rev. 1/2014)

Dear Ms. Chung and Ms. Tae:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the revised draft General Plan dated January 2014. On previous General Plan drafts, we provided comment letters dated 08/29/2007, 01/22/2009, 09/08/2011, 07/26/2012, and 11/7/2013. Comments that were not incorporated but that the Habitat Authority believes still apply are reiterated here.

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 its 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 endeavors 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 areas of the Puente Hills known as Hacienda Heights and Rowland Heights.

A Joint Powers Agency created pursuant to California Government Code §6500 *et seq.*
7702 Washington Avenue, Suite C, Whittier, CA 90602 • Phone: 562 / 945 - 9003 • Fax: 562 / 945 - 0303

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Part II. Planning Areas Framework

Chapter 5. II. Planning Areas Descriptions

1. In Table 5.1 on page 27, various Opportunity Area Types are listed as areas to be considered when preparing community-based plans. Please consider adding a type for Open Space .

2. It is assumed that on page 35 under Geography, "The San Gabriel River runs along the Interstate-610…." should be "The San Gabriel River runs along the Interstate-605….".

Part III: General Plan Elements

Chapter 7: Mobility Element

3. On page 102, Section 5. Impacts of Transportation on Natural and Community Resources -The Habitat Authority recommends a discussion on how changes in transportation can influence accessibility of open spaces (i.e. greater access) leading to an increase in the number of visitors and potentially affecting biological resources.

Chapter 9: Conservation and Natural Resources Element

4. Policy C/NR 1.2 states "Protect and conserve natural resources, natural areas, and open spaces on park properties." It is unclear why this would only pertain to "…park properties." We believe it is the intent of the Policy to cover all natural resources, natural areas, open space, and potential park properties in unincorporated LA County. Therefore, please consider adding following in italics and deleting the strikethrough: *"Protect and conserve natural resources, natural areas, and open spaces* ~~on park properties~~*."*

5. Regarding Policy C/NR 1.5: "Increase and improve access to dedicated open space and natural areas for all users." The County works with numerous land owners (see Appendix E) who own/manage open space within the jurisdiction of this General Plan. Since the County cannot control access to land that they don't own/manage, please clarify by adding the following italicized language. "Increase and improve access to dedicated open space and natural areas for all users *as determined appropriate by each land management agency*."

6. Policy C/NR 1.6 states "Prioritize open space acquisitions for available lands that contain unique ecological features, streams, watersheds, woodlands, grasslands, and/or offer linkages that enhance wildlife movements and genetic diversity." However there are numerous other important habitat types besides woodlands and grasslands that support important natural resources. Therefore, please consider amending the sentence as noted in italics with deletions in strikethrough: "Prioritize open space acquisitions for available lands that contain unique ecological features, streams, watersheds, ~~woodlands, grasslands,~~ *habitat types* and/or offer linkages that enhance wildlife movements and genetic diversity."

7. Regarding Policy C/NR 2.4 to "Collaborate with public, non-profit, and private organizations to acquire and preserve available open space lands.", please consider adding the following language in italics to include the acquisition of land in different land use categories that could be converted to open space: "Collaborate with public, non-profit, and private organizations to acquire and preserve available open space lands *or other lands that could be converted to open space*."

8. On page 128, 2nd paragraph, the Habitat Authority recommends that language be added into the SEA Ordinance allowing public land preservation agencies with adopted management plans to carry out all activities that contribute to the management of the land for preservation, access and safety.

9. On page 130, Policy C/NR 3.9 outlines design considerations for projects proposed in SEAs. The Habitat Authority recommends inclusion of a requirement that such projects retain a contiguous area of undisturbed open space over the most sensitive natural resources to maintain regional connectivity within the undeveloped area, and to preserve these areas in perpetuity through a recorded fee simple dedication to an open space park agency currently operating and/or based in the project area prior to the issuance of any permits.

10. Regarding Policy C/NR 7.2 to "Support the preservation, restoration and strategic acquisition of open space to preserve natural streams, drainage paths, wetlands, and rivers, which are necessary for the healthy function of watersheds.", the acquisition of land types, other than open space, could converted to open space for the protection of those resources. Therefore, please consider adding the following language in italics: "Support the preservation, restoration and strategic acquisition of open space*, and other land types that could be converted to open space,* to preserve natural streams, drainage paths, wetlands, and rivers, which are necessary for the healthy function of watersheds."

11. In Section IV Goals and Policies, Policy P/R 1.9 is to "offer more lighted playing fields using energy efficient light fixtures where appropriate to extend playing time." Please consider implementing spill light limits on ballfields that are adjacent to open space. We suggest the following: "All lighting shall be designed and shielded with the intent of preventing spillage of light into adjacent open space areas. All lighting shall be constructed so that all light emitted by the fixture, either directly from the lamp or from a diffusing element, or indirectly by reflection or refraction from any part of the luminaire, is projected away from the open space as determined by photometric test or certified by the manufacturer."

<u>Appendix E: Conservation and Natural Resources Element Resources</u>

12. On page 40-41, regarding the summary of the Puente Hills SEA, it notes that "significant wildlife movement throughout the Puente Hills SEA has been documented in a two year carnivore study commissioned by the Santa Monica Mountains Conservancy as part of a multi-jurisdictional effort to establish a region wide wildlife movement linkage." Please

update this statement to acknowledge numerous additional wildlife movement studies that have been conducted in this SEA on the Puente Hills Preserve, including several studies of both the Harbor Boulevard Wildlife Underpass and the Colima Road Underpass, all of which are available on the Habitat Authority's website (www.habitatauthority.org/publications).

13. Due to an agency name change, on page 44 (and throughout document), change "California Department of Fish and Game (CDFG)" to "California Department of Fish and Wildlife (CDFW)".

14. The Regional Habitat Linkages section in Appendix E (Conservation and Natural Resources Element) states on page 40 that "critical biological resources are maintained through habitat connectivity, which sustains population genetic diversity, and provides refuge for migrant species". In addition, the Significant Ecological Areas section of Appendix E (page 44) states that one of the two primary conservation principles on which the SEAs are designated is that "isolated habitat areas have less opportunity to regain species by re-colonization from other areas" and that "The SEAs are designed to provide habitat linkages between related habitat types…by encompassing areas of sufficient width to function as wildlife movement routes between these open space areas".

    Please consider revising the SEA selection criteria to directly acknowledge the importance of habitat connectivity and wildlife movement corridors on pages 44-46. It is clear from the language in the Draft General Plan Appendix E, that wildlife movement corridors and habitat connectivity are critical to the concept of SEAs. However, the SEA selection criteria do not mention wildlife movement, corridors, or habitat connectivity[1]. The only criterion that can be construed as being related is criterion D: "Habitat that at some point in the life cycle of a species or a group of species, serves as concentrated breeding, feeding, resting, or migratory grounds, and is limited in availability either regionally or in Los Angeles County". Please consider revising the SEA selection criteria to include lands that provide habitat connectivity and wildlife movement corridors and opportunities, as consistent with the Draft General Plan in Appendix E. The maintenance of wildlife populations in western portions of the Puente-Chino Hills, such as in the Habitat Authority's Preserve, are critically dependent on the movement of individuals from locations further east in the Corridor, and a reduction of this potential movement may pose a serious threat to the persistence of these populations in the future[2].

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[1] PCR. 2000. Los Angeles County Significant Ecological Area Update Study 2000: Background Report. Prepared for: Los Angeles County Department of Regional Planning. November 2000.
[2] Conservation Biology Institute. 2005. Maintaining Ecological Connectivity Across the "Missing Middle" of the Puente-Chino Hills Wildlife Corridor. July 2005.

The following comments are regarding the description of the Puente Hills SEA, beginning on page 136:

15. On page 138, fourth paragraph, please note in the text that Sycamore Canyon also supports coastal cactus wrens.

16. On page 139, first paragraph, please add language that describes the habitat in Arroyo San Miguel as coastal sage scrub, chaparral, grassland and riparian and supporting a population of federally-threatened coastal California gnatcatcher.

17. Please note that as of August 15, 2011, due to an amendment of the Habitat Authority's Joint Powers Authority Agreement, the official agency name changed to Puente Hills Habitat Preservation Authority (PHHPA). Please use this name when referring to the agency in future documents and correspondence. On page 139, the last paragraph still references the old agency name. Please check the document for other instances.

18. 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 as well as because of its intrinsic value in supporting significant populations of sensitive animal species.

Comments on Community Climate Action Plan

Based on review of the Community Climate Action Plan, the Habitat Authority respectfully submits the following comments:

1. Page 5-6, Table 5-1, Land Conservation and Tree Planting – Protect Conservation Areas: Please consider not only the evaluation of the Oak Woodland Conservation Management Plan for the preservation of existing oak woodlands but preserving all other native habitats as well. There are numerous native habitats within Los Angeles County that provide important habitat for a suite of species including those protected by law such as the federally threatened California Gnatcatcher, *Polioptila californica*, that depends on coastal sage scrub habitat and the California State Species of Special Concern Coastal Cactus Wren, *Campylorhynchus brunneicapillus*, that nests almost exclusively in prickly pear (*Opuntia littoralis* and *O. oricola*) and coastal cholla (*O. prolifera)*, within coastal sage scrub habitat, to name a few. In addition, the California endemic Southern California black walnut (*Juglans californica* var. *californica*) is severely threatened by ubanization and is considered by The Nature Conservancy and the state of California to be one of California's "rare and imperiled natural communities" (http://www.fs.fed.us/database/feis/plants/tree/jugcal/all.html). The Chino-Puente Hills is a major center of distribution for this species and is one of the dominant woodland community tree species in the Puente Hills Preserve. Therefore, please consider revising the Initial Implementation Step in Protecting Conservation Areas to include a complete review of all native communities.

2. Page C-20 , LC-2 Create New Vegetated Open Space – Additional Information:
   This section currently states that "New vegetated open spaces should be designed and maintained to minimize the spread of invasive species." Please considering adding language to encourage the use of drought-tolerant native plantings in all revegetation projects since this can contribute to decreasing water consumption.

3. Page C-20, LC-4 Protect Conservation Areas – Action Status:
   The *Additional Information* (page C21) acknowledges that open spaces can sequester atmospheric CO_2 creating a sink of carbon and thus having Greenhouse Gas (GHG) benefits. However, the Plan currently states that "GHG emissions reductions have not been quantified or counted toward attainment of the County's CCAP target." Therefore to acknowledge the contribution of open spaces as carbon sinks, the Habitat Authority recommends conducting a quantifiable analysis of open space area contributions to atmospheric CO_2 sequestration.

4. Page C-21, LC-4 Protect Conservation Areas – Approaches:
   To support the Action Goal of "Encourage the protection of existing land conservation areas" please consider the preservation of other native habitats besides oak woodlands (see detailed info in comment 1).

We appreciate the opportunity to comment on the General Plan and CCAP documents. Please notify us when the Habitat Conservation Plan, Mitigation Land Banking Program, Trails Master Plan, Open Space Land Acquisition Strategy, and Oak Woodland Conservation Management Plan, documents are available for public review.

Thank you for your consideration of our comments. Feel free to contact me or Lizette Longacre, Ecologist, at (562) 945-9003 for further discussion.

Sincerely,

Bob Henderson
Chairman

cc: Board of Directors
Citizens Technical Advisory Committee

COX CASTLE NICHOLSON

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File No. 67941

March 18, 2014

Regional Planning Commission
County of Los Angeles
320 West Temple Avenue
Los Angeles, California 90012

Re: Alpine Village in West Carson: Economic Development Element of County General Plan Update
Regional Planning Commission Hearing Date: March 26, 2014

Dear Commissioners:

We represent the owners of Alpine Village to oppose a recommendation by the Department's General Plan Section to eliminate the industrial plan category on fourteen acres along the Harbor Freeway. The General Plan Section would substitute a commercial plan category over all fourteen acres owned and operated by Alpine Village.

Alpine Village was one of the first developers to bring vision to West Carson, taking a fourteen-acre landfill and building a retail and entertainment destination along Torrance Boulevard at the Harbor Freeway.

Alpine Village has been a hub of European culture in Southern California since 1968 and has been a mainstay in the community of West Carson, an area that is designated as a State Enterprise Zone and is one of the last areas to be undeveloped along the County's major Harbor Freeway corridor.

The General Plan Section's proposal does not respect the four-decade old industrial designation, the importance of accommodating the longstanding Oktoberfest festival at the property, or a pending land use application, and the Section overlooks the potential for industrial development along this important Freeway corridor near the ports of Los Angeles and Long Beach and the Los Angeles International Airport.

Only the narrow strip along Torrance Boulevard is occupied by permanent structures, leaving most of the property underutilized and available potentially to industrial development consistent with the neighborhood.

The industrial site has hosted many temporary activities for more than forty years and the general plan category has always been industrial. There are no permanent facilities on

the undeveloped remainder, which is adjacent to the Freeway on the east, industry to the north, and well buffered from any residential areas. The popular Oktoberfest is forty-six years old, occurring over eight weekends every year in a temporary tent structure at Alpine Village. Oktoberfest may have difficulty fitting into the narrow requirement of any proposed commercial plan category.

Similarly, Alpine Village now seeks to build an event center that will host a variety of activities. The facility could include, according to a pending application: sporting events; Oktoberfest and other popular celebrations; conventions and festivals; concerts; and fundraisers.

The specific land use implications of this approach to Alpine Village are outside the scope of the Countywide General Plan Update. Any plan or zone change should be left to a subsequent, more specific and narrow land use proceeding initiated by Alpine Village.

The attachment provides additional information and explains why the Regional Planning Commission should recommend retaining the forty-six year old industrial designation for Alpine Village.

We look forward to the General Plan proceedings which affect the West Carson area and Alpine Village.

Very truly yours,

Charles J. Moore

CJM/klp
Enclosures
067941\6062232v1
cc: Mr. Richard Bruckner
Mr. Mark Child
Ms. Connie Chung
Ms. Sorin H. Alexanian
Mr. Mitchell Glaser

RETAIN CURRENT INDUSTRIAL PLAN CATEGORY
FOURTEEN ACRE ALPINE VILLAGE SITE;
WEST CARSON STUDY AREA NUMBER TWO

1. The fortunate location of this property makes it especially desirable for future industrial development as well as commercial uses. The site provides direct freeway access, public infrastructure, nearby transportation corridors for freight and proximity to harbors and airports.

2. There are not adequate planning justifications for eliminating the long standing industrial planning category from this strategic site. Nearby land is planned for and in some cases already developed with industrial uses, and Alpine Village is equally well situated for attracting new industry or commercial use to this West Carson Study Area.

3. There is an acknowledged shortage of available industrial property in the County. Encroachments by poorly placed and incompatible development have occurred, and should not continue by eliminating another industrial resource like the ten acre Alpine Village site.

4. Pending zoning applications by Alpine Village support retaining the industrial planning category. Alpine Village has on file at the department an application to establish an event center. The technicalities of an event center, designed to serve a range of commercial, cultural, entertainment and recreational events, are most compatible with flexible industrial planning and zoning. Careful conditioning of future proposals for either industrial or commercial uses can insure compatibility.

5. Existing recreational and entertainment activities at Alpine Village were established in reliance on the industrial character of the site. Oktoberfest, recently renewed by the

Planning Commission, operates several weekends each year and has been an important cultural and recreational opportunity for decades. The proposed commercial plan category may be too restrictive and less compatible with these important activities.

6. Investors have expressed interest in the Alpine Village industrial site, but not for retail commercial uses as the general plan section would dictate.

7. The general plan section's proposal is a disincentive to future economic development and improvements on the site. Retaining the industrial plan designation will promote both commercial and industrial opportunities.

8. A comprehensive strategic plan for economic development, prepared by the Los Angeles County Economic Development Corporation, supports retention of this industrial land resource, not its elimination.

9. The owners of Alpine Village were never consulted about this plan change proposal and they received only a general announcement of the general plan update.