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July 11, 2014

Carl Nadela
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Department of Regional Planning
320 West Temple Street, Room 1356
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RE: Content and scope of the environmental information and analysis to be contained in the EIR for the Los Angeles County Antelope Valley Areawide General Plan Update

Dear Mr. Nadela:

Thank you for the presentation at the scoping meeting. I appreciate the work of Regional Planning in drafting and moving towards completion the AV Town and Country.

I am hopeful, and suggest, that the EIR address' some alternatives concerning issues related to water and its broadening of most of the SEA areas.

The SEAs appear to be larger in the plan than currently exists and in addition, there is something new called Connectivity and Constriction Lines (C&C Lines). I understand this allows SEA expansion in any direction 1,500 feet. These "lines" and the description of their purpose are a further potential expansion to the current SEA boundaries. These lines are not necessarily in the middle of the SEA so it could result in a further dramatic increase of those boundaries. An alternative should be to include only the existing boundaries, without expansion, nor the C&C Lines. If it is determined that the expansion of an inclusion of the C&C Lines is a "taking" of the private property then an alternative should be reviewed as to extent that the "taking" will compensate private property owners. The alternative is to leave the SEA's the same as in 1986, (I think later amended in the 1990s) and then expand on a case by case basis with possible "in-kind" compensation to the private property owners for the addition taking and restrictions. The expansion without a study is contrary to the existing 1986 Plan. (See below)

It is not clear from the documentation whether water conservation programs and water banking is allowed in an SEA? This use within an SEA should be mentioned and supported by the plan, if not perhaps deemed compatible by right. It is critical for the Antelope Valley to have the ability to conserve its local water from runoff of the San Gabriel Mountains along with banking by percolation of imported water. Imported water would generally be along the State aqueduct system but may be piped to other areas within or outside an SEA. There should be an alternative that includes the necessity and promotion of these water conservation programs. In addition, the AV Groundwater Adjudication suit will be eventually be settled, and one crucial element of a promising settlement is to include these types of water conservation and water banking programs to re-supply the groundwater. The AV Plan by itself should not interfere with this conservation but embrace it with acknowledgement of a compatible use in the SEAs. There are already other capable agencies that give adequate oversight to these programs without the added layer of the AV Land Use Plan.

The same will be true for the sand and gravel operations. The Antelope Valley may be the last area in Los Angeles County for the mining of sand and gravel operations. It represents a significant asset to LA

County. While it is clear that we need this aggregate resource for growth, it may not be as clear that these resources are needed for day to day maintenance of the great infrastructure in LA County. Again, acknowledging this important resource for our land use plan creates sense that water conservation and mining are recognized in the plan as a necessity of future trade-offs. Not addressing this in the plan or alternative is short sighted. I might add that LA County, in acknowledgement of water as a vital resource to the Antelope Valley is currently reviewing the reactivation of the cloud seeding program for such water conservation practices. If not conserved and planned, any additional water gained through runoff runs off to the dry lake beds of Edwards AFB where the conditions do not allow for recharging the AV ground water basin.

The AV Plan needs to be in concert with the LA County General Plan but our unique area (or for that matter any Supervisorial area) will need to have area specific policies that may need to be exempt from those general plan policies and there should be a written acknowledgment of this potential in both plans and how to resolve it. The alternative is to mention that there will in fact be some inconsistencies between the two plans in the future and the initial guideline to resolve is to use the AV Plan, provided the specific AV Land Use policy is not in violation of rule, law or ordinance. I don't believe it is the intent of the general plan to purposely "trump" the specific wishes of the residents of the Antelope Valley and vice versa.

Thank you for the opportunity to comment.

John Blalock

FROM THE 1986 PLAN

A. Land Use Policy Map, 2.

Page VI-11

#2. Interpreting the Land Use Policy Map (d)

Minor adjustments to the lines to more closely conform to the statements of intent found in Paragraph 3 may be appropriate provided that the following conditions are found to exist:

- 1.) The basic relationship between land use types depicted by the Land Use Policy Map is maintained.
- 2.) The adjustment in boundaries does not result in major, unanticipated impacts on existing or planned service systems;
- 3.) The property is appropriate from a capability and suitability standpoint for the intended use;
- 4.) No significant adverse environmental, social or economic impacts are anticipated; and
- 5.) The boundary adjustment can be shown to further the goals and objectives of the AV Areawide General Plan and the other chapters and elements of the County of LA General Plan.

Page VI-17

#8. Significant Ecological Areas...

Future additions and deletions to identified SEA's may be appropriate based upon updated, more detailed biotic surveys. It is the intent of the General Plan policy to preserve the Antelope Valley's significant ecological resources and habitat areas in as viable and natural condition as possible. Major factors influencing the realization of Plan objectives in this regard include the County's ability to accurately identify areas of significant resource value; the availability of financial and other resources necessary to support preservation, restoration and enhancement efforts; and **competing priorities between resource preservation and other critical public needs.**

Recognizing the resource values at stake and the constraints imposed by competing priorities and objectives, the General Plan seeks to provide a process for reconciling specific conflicts between proposed land use and the preservation of identified SEAs. The Plan does not, however, suggest that this can be accomplished by applying single set of regulatory standards to all SEA's Nor does it infer that reasonable use of privately held lands within such areas shall be precluded without just compensation. Instead, the Plan recognizes that measures necessary to preserve and enhance SEAs will vary depending on the nature of resource values present and the degree of threat implied by potentially incompatible development. Within the context, the following general conditions and standards are provided to guide specific land use decisions.

Page VI-18

SEA Compatible Land Uses

Within Significant Ecological Areas the following activities are considered compatible by definition: regulated scientific study; passive recreation including wildlife observation and photograph, limited picnicking, riding and hiking; overnight camping. In addition, the following uses may be compatible as determined by a detailed biotic survey and such conditions as may be necessary to ensure protection of identified ecological resources:

- a.) Residential uses at densities compatible with the resource values present, and consistent with community character in terms of both overall density and magnitude as set forth in this plan
- b.) Where provided for in this plan, commercial uses of minor nature serving olocal residents and visitors;
- c.) Where no alternative site or alignment is reasonable, public and semi-public uses essential to the maintenance of public health, safety and welfare;
- d.) Agriculture uses compatible with the resource values present;
- e.) Where compatible with identified biotic resources, extractive uses including oil and gas recovery, and **rock, and gravel quarrying;** and
- f.) **Uses related to the conservation of water.**