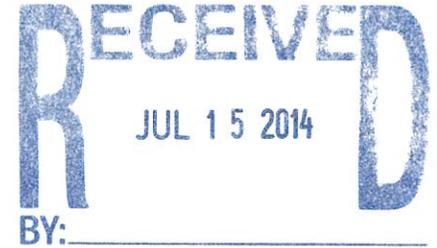


# *Blue Ribbon Committee*

July 11, 2014



## *Committee Members*

Harvey Holloway, Co- Chairman  
James D. Vose, Co-Chairman  
Wayne Argo  
Karen Bryan  
Kimberly Mavers  
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Carl Nadela  
Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1356  
Los Angeles, CA 90012

RE: Issues for Inclusion in the AVAP Environmental Impact Report

Dear Mr. Nadela:

The Blue Ribbon Committee (BRC) requesting the issues contained in this letter be included in the scope of the Environmental Impact Report (EIR) for the Antelope Valley Areawide General Plan Update (AVAP).

## *Elected Officials*

Senator  
Steve Knight

Assemblyman  
Steve Fox

## *Associations*

BIA - Building Industry  
Association  
Los Angeles Ventura  
Chapter

Greater Antelope  
Valley Association of  
REALTORS®

### **Economic Opportunity Areas:**

Identified within the AVAP are three Economic Opportunity Areas (EOAs) centered around major transit corridors that "would bring tremendous opportunities for growth and economic development in the vicinity of these projects". These EOAs would bring stable economic growth for the future generations of the Antelope Valley.

In the AVAP, DRP staff has indicated that further studies and a more detailed planning effort will need to be done for each EOA by way of a Community Plan. The EIR will be inaccurate if some future Community Plan is postulated now with changes to the currently projected AVAP analysis and data. Any discussion of a future Community Plan to re-visit the EOA's must be only part of a Project Alternative and not part of the Project.

The EOA's are an important concrete part of the AVAP and must not have an open-ended reviewing/studying component; They need to be addressed directly in the EIR as the activity nodes that they are. The AVAP EIR must accurately address any impacts associated with the allotted residential units and projected commercial acreage that will bring jobs/housing to those areas. We ask that the EIR include the EOA's in its analysis as is and that Community Plans not be a part of the AVAP. Future land owners will still have to submit a project level EIR for any development plans they want the County to approve and the EOA concept is already sufficient for programmatic determinations at the AVAP EIR level. This will ensure Los Angeles County's ability to review proposed development within these EOAs in more detailed without adding the unnecessary Community Plan that will alter the EIR currently being drafted. Additionally, the EIR must address how the EOA's balance environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance.

### **Community Standards Districts:**

The EIR of the AVAP will analyze impacts associated with land use changes and zoning changes proposed by the County. The Land Use portion proposes to down-zone much of the land within currently adopted and proposed Community Standards Districts. The AVAP EIR should address these changes and provide research-based substantiation for those

changes. The activities that have led to the existing and the proposed Community Standards Districts have been vetted by the various communities and any changes via the AVAP to the underlying densities and land use designations have the potential for substantial alterations to housing, population and other human activity-related environmental activities. No environmental analysis will be considered complete unless the existing district land use patterns are included in all project alternatives, including the No Project Alternative.

**Use of all the most recent information and studies:**

The AVAP is shaping the Antelope Valley for future generations. The EIR must include with its analysis current and proposed transit projects, including NW 138, High Speed Rail and High Desert Corridor. And population growth associated with Southern California Association of Governments RTP/SCS projections. With these projections included in the AVAP EIR, it will give a unified planning effort that will allow the community's future housing and jobs to be proactive and bring economic growth to that region.

**Rural town centers/Rural Town Areas vs. Rural preservation areas:**

The AVAP has created hard-line boundaries for existing activity nodes without providing any substantiation for their existence. While a "town center" concept can help focus a balance between housing and jobs, the manner does not provide for the diversity of housing and population that is always found in rural areas of the country and in the existing land use patterns of the Antelope Valley. The areas identified as Rural Town Centers and Rural Town Areas need to include softer edges that allow for reasonable opportunities for the addition of a more diverse set of housing and commercial activities. The other area identified is the Economic Opportunity Areas whose creation is the provision of new locations for reasonable growth within the rural milieu of the valley. However, the down-zoning of the rural preservation areas, which include all remaining unincorporated areas, has the potential to create substantial environmental impacts across the Antelope Valley. The AVAP EIR must address those potential impacts, including, but not limited to, agriculture, biota, geology, hydrology, land use planning, mineral resources, population and housing, delivery of public services, recreation and transportation. The AVAP Project postulates a near vacancy of a substantial amount of the valley. At least one of the Project Alternatives must address a more open, organic (rather than proscribed) maturity of the those open portions of the valley so a more diverse pattern of development closer to the existing pattern may continue. In addition, the rural preservation concept may not be consistent with the adopted or proposed with Community Standards Districts. The EIR should include an alternative with the Community Standards Districts zoning. Additionally, the EIR must address the balance of development patterns and development diversity with environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance.

**Health Concerns:**

The RL-10 and RL-20 will allow one unit per 10 or 20 acres. While the AVAP is trying to create larger lots outside of the rural town centers, this could have a negative effect on both air quality and health impacts. Many lower density lots are graded and cleared of vegetation to allow the full use of the property. This can cause a significant increase in wind and borne dust. Particles with diameters of 10 micrometers or less are referred to as Particulate Matter 10 or PM 10 and those with diameters of 2.5 micrometers or less are PM 2.5. With the windy conditions in Antelope Valley, PM 10 and PM 2.5 are a common worry. The AVAP EIR should address how such low density zones will affect the inherent health problems associated with Valley Fever or other airborne viruses that are directly related to large vacant lots with no or little vegetation or development to break up prevailing winds. Additionally, the EIR must address environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance.

**Land Use Proscription by Pre-defined Constraint:**

The land use patterns, densities and designations shown in the AVAP as proposed for the Project were developed under what has been described as a Hazard, Environmental and Resource Constraints Model (ECM) created by the county. The ECM is described as “a tool to inform stakeholders of potential site constraints and regulations” (General Plan Appendix C, Public Review Draft, 1/2014).

However, the “tool to inform” about regulation has become the regulation itself.

The ECM is purported to ‘front-load’ all the underlying environmental hazards, issues, constraining factors and resources (or lack thereof) that could affect the ability of a particular site to be developed with improvements. However, the model’s concept as presented does not provide any quantitative analysis or qualitative set of findings or determinations as to how the constraints identified translate into the development designations and densities imposed let alone the three ‘classes’ identified in the appendix.

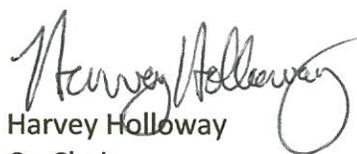
After a thorough analysis of the ECM itself and the underlying data and assumptions, the EIR should address ‘how’, ‘why’ and ‘with what data’ the links between the ECM and the AVAP land use designations were arrived at. This substantiation is critical to all the land use, population, housing and environmental justice analysis throughout the EIR and will also inform many portions of the other areas of review and analysis.

**School District and Education Issues:**

The AVAP EIR must address the potential impacts on the several school districts in the valley (Eastside, Wilsona, Keppel, Gorman, Westside, Acton-Agua Dulce, Antelope Valley Union High School and Antelope Valley College). Each of these sovereign jurisdictions regularly reviews its demographic and growth parameters. The AVAP EIR must address how the activities of the plan effect those plans and policies and, in so far as is possible, provide how there is a conflict or consistency between the AVAP and the work of each district including but not limited to the areas of land use planning (over which the district hold certain levels of sovereignty), population and housing, delivery of public services, recreation and transportation. Additionally, the EIR must address environmental justice concerns for the existing and potential future school and residential populations and constituencies that will rely on this valley to provide habitation, sustenance and education. Consideration must also be given to the long term impact that any change in land use has on the delivery of educational services. Decreasing rural density has a profound impact on delivery of instruction, length and cost of transportation, limitations on services to students, loss of revenue to school districts and thus reductions in staff. These may be unintended consequences of the proposed EIR.

Please feel free to contact us with any questions you may have, or clarifications you may need. We appreciate the opportunity to request these additional analyses which we believe will produce a better plan for the Antelope Valley.

Sincerely,

  
Harvey Holloway  
Co-Chair

  
James Vose  
Co-Chair

Cc: Supervisor Antonovich  
Edel Viscera  
Norm Hickling