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July 11, 2014

Mr. Carl Nadela
Regional Planner
Los Angeles County
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

RE: AVAP Environmental Impact Report Scoping Comments

Dear Mr Nadela:

The Los Angeles-Ventura Chapter of the Building Industry Association of Southern California, Inc. (BIA) is the voice of residential building and development in Los Angeles and Ventura counties. We represent the thousands of men and women and their member companies who design, plan, build, and remodel homes, condominiums and apartments throughout our region.

As an association of industry professionals, technicians and skilled craftsmen we have deep knowledge and expertise in residential building and development. As such, we support safe, healthy, sustainable and quality rental and ownership housing, and measures that assure an adequate supply and range of housing types, sizes and costs that support a variety of lifestyle choices.

The Association has participated since 2011 on the Blue Ribbon Committee in the Antelope Valley, reviewing the progress of the Antelope Valley Areawide Plan of the County General Plan. We have provided input into the drafting of the Plan and support aspects of the revised Plan, and continue to have concerns in others. We respectfully request the information below be included in the AVAP EIR study.

Significant Ecological Areas:

The Antelope Valley Areawide Plan has included the proposed SEA Ordinance with an expansion of 150,000 acres in the Antelope Valley. This expansion brings the SEA area in the Antelope Valley to over 290,000 acres of SEA designated property in its Land Use Plan. This ordinance has not been approved by the Regional Planning Commission and is still being vetted through public comment. The AVAP EIR should

only analyze adopted ordinances and its EIR should not study a proposed draft ordinance, unless it is considered as a Project Alternative and not as the Project.

The SEA analysis, should include detailed scientific, research-based justification for the extent of the proposed designation areas including, but not limited to primary research on the potential impacts on agriculture, biota, geology, hydrology, land use planning, mineral resources, population and housing, delivery of public services, recreation and transportation. Especially because of the extent of the potential degradation of population, housing and other human activity-related environmental activities, justification of the boundaries and the incumbent regulation of that land needs a substantial basis to give the lead agency an opportunity to weigh the impacts. Additionally, the EIR must address the balance of the SEA's to 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.

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 detail 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 community 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 pro-active 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 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.

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.

In summary, we request the above issues be studied as a part of the AVAP EIR process. The CEQA EIR process is designed to provide a sound understanding of the impacts of a project and in this instance the impacts of the new Antelope Valley Areawide Plan. The final EIR will provide alternatives for consideration by the community and the Board of Supervisors. We look forward to reviewing the final Project and its proposed Alternatives, as we seek a Plan that gives the Antelope Valley community an adequate supply and range of housing types, and a jobs-to-housing ratio that allows residents to enjoy economic prosperity close to home.

Sincerely,



Tim Piasky
CEO