



July 11, 2014

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

Subject: Comments on the Scope and Content of the Environmental Information and Analysis in the Antelope Valley Area-Wide General Plan (Plan)

Dear Carl:

The Los Angeles County Farm Bureau appreciates the opportunity to comment on the subject Plan. We will be pleased to work with you and the Department of Regional Planning to improve the Plan by providing data, identification of technical experts to help in the preparation of an improved Plan, etc.

GENERAL SUMMARY

Although the Area Plan proposes to help the environment, a closer examination of the Area Plan suggests that many environmental factors in the Plan's preparation were not considered, and the net effect on the environment by the Area Plan is negative. The Area Plan proposes to devalue significant areas of land and considerably reduce the property tax revenue stream into the County of Los Angeles.

SPECIFIC COMMENTS

Not Considering Some of the Most Important Issues

Summary

Any plan is not credible and practically useless if the significant issues are not acknowledged and analyzed. One severe problem that has been overlooked is the effect of the Antelope Valley Groundwater Adjudication on the Plan. In addition, the natural, historical pattern of build-out (or lack thereof) of the rural areas of the Antelope Valley over the last many

decades is also not identified and the effect of this natural phenomenon on the Plan is not considered.

Discussion

As a result of the adjudication, parcels with no pumping history most likely will not receive any affordable water. Small pumpers and shareholders and customers of mutual water companies will only have enough water for indoor use. Farmers will be cut back over 50%. Estimates have been given that roughly 30,000 acres of previously irrigated and disturbed land will no longer be irrigated. The consequence is that the supply of water will be very minimal and the cost will be unaffordable. This means that the unincorporated area of the Valley is automatically doomed to be rural without the Area Plan. In fact, the threat of the adjudication is so real that some rural communities, such as those served by mutual water companies, do not believe they can sustain their existing rural lifestyle.

Need for Additional Analysis

The adjudication is nearing an end and the rights of the various parties are becoming defined. The effect of the Adjudication on the Antelope Valley community needs to be clearly discussed and the impacts inserted into any planning activities that include the Antelope Valley.

The natural and historical pattern of development (or lack of development) of the rural areas of Antelope Valley also needs to be identified and considered in any planning activities that include the Antelope Valley.

Agricultural Resources

Summary

Based on the behavior of Los Angeles County Waterworks District No. 40 in the Antelope Valley Groundwater Adjudication and the Department of Regional Planning in their Area Plan, many believe these agencies are working together to destroy agriculture in the Antelope Valley. These two County agencies appear to be giving the farmer a “double whammy” to drive him or her out of the Valley.

Discussion

Rights under the adjudication are becoming defined. The Court wants to examine the proposed settlement at a Court date of August 4, 2014. It appears that farmers and growers will be cut back to less than 50% of their historical groundwater pumping. Most cannot exist with these small amounts of water. Replacement water will be too expensive for agriculture.

In addition, the Area Plan decimates the value of property in the unincorporated area of the Valley because of the limitation on dwelling units per acre. For example, hardly any market exists for parcels restricted to 1 dwelling unit per 10, 20 or 40 acres. Many farmers have worked their entire lives with the expectation of selling their property to a developer to have enough

financial resources to retire, pay “death taxes,” pay off debts, etc. To remove this opportunity which folks have planned for and enjoyed in perpetuity is unjust.

In addition, banks and other financial institutions consider the net worth of farmers, ranchers and other property owners when making loans. To eliminate the value of their land will make obtaining operating loans for farmers extremely difficult if not impossible. The Area Plan will significantly devalue all property in the unincorporated areas of Los Angeles County thereby putting a sudden financial hit on these property owners.

Need for Additional Analysis

Please examine the Area Plan in light of the foregoing concerns. Quantify the impacts on the agricultural industry and include these impacts in the Plan

Compact Development

Summary

Although the concept of Compact Development may be environmentally helpful in some scenarios, difficulty is encountered in believing this concept is applicable under the Antelope Valley conditions.

Discussion

The proposed Area Plan promotes the concept of Compact Development as an environmental benefit without considering the drawbacks and problems.

Proponents of compact development argue that rebuilding American urban areas to higher densities is vital for reducing greenhouse gas emissions because less vehicle miles are travelled. Compact development policies represent a huge intrusion on private property rights, personal freedom, and mobility. Some planners raise the possibility that compact city policies could increase emissions by increasing roadway congestion. Costs associated with this policy include reduced worker productivity, less affordable housing, increased traffic congestion, higher taxes or reduced services and higher consumer costs.

Given the variety of jobs and the number of jobs in the San Fernando Valley and greater Los Angeles area, the likelihood that such a policy would ever be effective is remote. Consider that this policy assumes that global warming exists, that human activity leads to global warming, and that compact development is environmentally helpful. Each assumption is very controversial. Therefore, for these assumptions to exist together demonstrates a low probability of success.

The time necessary to implement such a policy to be effective seems enormous.

Need for Additional Analysis

Please examine the concept Compact Development, not in a general sense, but directly applicable to Antelope Valley. The basis behind Compact Development rests on three issues that

are controversial: Global warming exists, global warming is significantly exacerbated by human activities, and that compact development is useful under the Antelope Valley conditions. Provide a thorough scientific analysis, based on peer-reviewed literature citations and opinions of nationally-recognized experts. Traffic modeling, with several variations, would be helpful to estimate the effect of compact development in this community.

Overlays

Summary

Large parcels such as those specified as RL 10, RL 20, and RL 40 represent significant environmental and health problems in arid and windy Antelope Valley and should be avoided.

Discussion

The overlays, e.g. RL 10, RL 20, RL 40, etc. propose to limit development to 1 dwelling unit per 10 acres, 1 dwelling unit per 20 acres, etc. History in the Antelope Valley has shown that when a party purchases parcels of this size, they immediately clear the property of native vegetation to improve appearances or level the property. Also, since irrigating a parcel of this size is expensive considering water and labor, parcels of this size are rarely adequately maintained. Since these properties have been disturbed, the potential for blowing dust and sand from the surface of these properties in the windy Antelope Valley is enormous and certain.

In contrast to relatively large parcels with 1 dwelling unit, parcels with many dwelling units are not subject to the scouring produced by the wind as a large parcel with only 1 unit. Many dwelling units per parcel tend to break up the flow pattern of the wind, that is, the "boundary layer," and do not allow the scouring action of the wind upon the exposed soil to the extent of only 1 unit on a large parcel.

Inherent health problems associated with Valley Fever, PM 10, PM 3.5, etc. are very real concerns. Valley Fever, for example, is a disease caused by a fungus found in the soil. The fungal spores are released when soil is disturbed, such as during scouring, then breathed into the lungs of those who become infected. They can devastate the body, causing skin ulcers, abscesses, bone lesions, swollen joints with severe pain, heart inflammation, urinary tract problems, and meningitis, which can lead to death. In some cases, the infection may manifest itself repeatedly or permanently over the life of the host.

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 World Health Organization designates particulates as a Group 1 carcinogen. Particulates are the deadliest form of air pollution due to the ability to penetrate deep into lungs and blood streams, causing permanent DNA mutation, heart attacks, and premature death. For instance, PM 10 can penetrate into the deepest parts of the lungs. PM 2.5 tend to penetrate into the gas exchange regions of the lung and very small particles may pass through the lungs to affect other organs. It

has been found that small particulate matter can cause similar brain damage as that found in Alzheimer patients.

Need for Additional Analysis

Many environmental and health issues of the RL 10, RL 20 and RL 40 overlays have been identified. Others may occur. Please provide a comprehensive list of environmental and health problems resulting from imposition of these overlays. Include mitigation measures if possible and identify problems which cannot be significantly mitigated. Provide a thorough scientific analysis, based on peer-reviewed literature and opinions of nationally-recognized experts. Specialties represented by desert ecologists and health professionals would be appropriate.

Significant Ecological Area (SEA)

Summary

Folks are concerned that the Significant Ecological Areas were arbitrarily designated without sufficient scientific analysis and justification.

Discussion

The identification of SEA areas is very troublesome because it is a method of devaluing large amounts of land that people have depended on for appreciation for many decades. The proposed SEA is not well documented and supported by science. Therefore, this approach can cause more harm than good. Existing farm land, especially that which has been disturbed for decades, should be excluded from these areas.

Need for Additional Analysis

Provide a thorough scientific analysis, based on peer-reviewed literature citations and opinions of nationally-recognized experts.

Air Quality

Summary

The Area Plan uses the concept of Compact Development with reduced vehicle miles to provide an environmental benefit. However, with a closer examination of the impact of the overlays, etc., the Area Plan may not only provide a negative environmental impact and health threats, but make the planned rural centers difficult to inhabit.

Discussion

Reducing vehicle miles may reduce greenhouse gas emissions under the proper environment. As discussed above, reducing greenhouse gas emissions by implementing the

concept of compact development is speculative under the conditions of Antelope Valley. The literature indicates that alfalfa has an enormous capacity to sequester carbon in the soil as well as the plant itself. Unlike most crops, alfalfa does not release oxides of nitrogen and methane into the atmosphere. Yet, the Area Plan focuses on a speculative plan for reducing greenhouse emissions and ignores proven approaches.

As discussed in the “Overlays” section above, the Area Plan increases the annoyance and health problems associated with windblown dust and sand. Also, the effects of the adjudication do the same. As a result of the adjudication, parcels with no pumping history most likely will not receive any affordable water. Small pumpers and shareholders and customers of mutual water companies will only have enough water for indoor use. Farmers will be cut back over 50%. Estimates have been given that roughly 30,000 acres of previously irrigated and disturbed land will no longer be irrigated. Many have said that the Adjudication together with the Area Plan will turn the Antelope Valley into a “dust bowl.” This means that existing rural communities may not be desirable to concentrate future development because of the annoyance of dust and the threat of health problems.

Need for Additional Analysis

These concerns need to be quantified and shared with the Supervisors and public.

Economic Impacts

Summary

The proposed Area Plan will devalue large amounts of land in the Antelope Valley. As mentioned above, no market exists, or has ever existed, for large amounts of land restricted to 1 dwelling unit per 10, 20, or 40 acres. The effect of imposing SEAs will exacerbate the problem of devaluation. The reduction in the property tax revenue stream will also be significant

Discussion

In addition to significantly devaluing farmers’ and other landowner property for questionable environmental gains, the County of Los Angeles should expect the Area Plan to reduce the property tax revenue considerably. I have heard estimates of a reduction of \$50 million per year, which assuming 5 to 6 % as the value of money, amounts to a present worth over twenty years or more of approximately \$1/2 billion. Additional costs of the health effects associated with the overlays discussed above should be considered.

Need for Additional Analysis

The Department of Regional Planning should quantify these property value and property tax income stream reductions for the Supervisors and landowners of Antelope Valley to review.

Environmental Solution to Consider

Summary

The Area Plan aims to maintain a rural lifestyle with some environmental benefits. Many have expressed concerns and an alternate solution is discussed here for consideration. This approach is essentially "time-tested" and deserves some review and analysis.

Discussion

Historical evidence over many decades has shown the natural development of the rural areas of the Antelope Valley to be extremely slow. Therefore, significant dispersed suburban development is expected to be naturally prohibited. The results of the current groundwater adjudication driven by Los Angeles County Waterworks 40 will assure that this slow process of dispersed urban development will become even slower or non-existent because affordable water most likely will not be available to rural properties.

This approach to sustaining the rural identity of the unincorporated areas will not be based on unfounded theoretical assumptions but will be based on historical activity plus the obvious lack of affordable water in the future.

Need for Additional Analysis

Please analyze this approach as something that may be modified and improved by considering all the elements and perhaps modifying some to attain an improved solution.

Carl, the Los Angeles County Farm Bureau will be pleased to work together with other community groups and the Department of Regional Planning to prepare an improved Plan that provides certain, measurable benefits.

Yours truly,



Eugene B. Nebeker, Ph.D., P.E.
President

cc: Supervisor Antonovich
Edel Viscera, Planning Deputy
Norm Hickling, Senior Deputy