

Ana Verde Hills Town Council
412 West Lake Drive • Palmdale, CA 93551

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

RE: Topics for Consideration in the AVAP Environmental Impact Report

Dear Mr. Nadela:

The Ana Verde Town Council is responding to the Notice of Preparation for the Antelope Valley Areawide General Plan Update (AVAP) Environmental Impact Report. We are requesting the issues contained in this letter be included in the scope of the EIR. The issues discussed are important to the residents of Ana Verde Hills specifically and the Antelope Valley community in general.

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.

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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 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 those

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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.

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 both 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.

The Ana Verde Town Council would welcome a presentation by the Department of Regional Planning on the updated Antelope Valley Areawide Plan. Please contact Forrest McElroy at 805-338-4358 to schedule a time for a presentation. We look forward to hearing from you soon.

Respectfully,



Forrest McElroy, Director

For: Patty Rardon, President

Cc: Ana Verde Town Council