



Three Points-Liebre Mountain Town Council
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11 July 2014

SENT VIA EMAIL

Mr. Carl Nadela, AICP
Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012
Email: tnc@planning.lacounty.gov

Dear Mr. Nadela,

Subject: Notice Of Preparation, Antelope Valley Areawide Plan

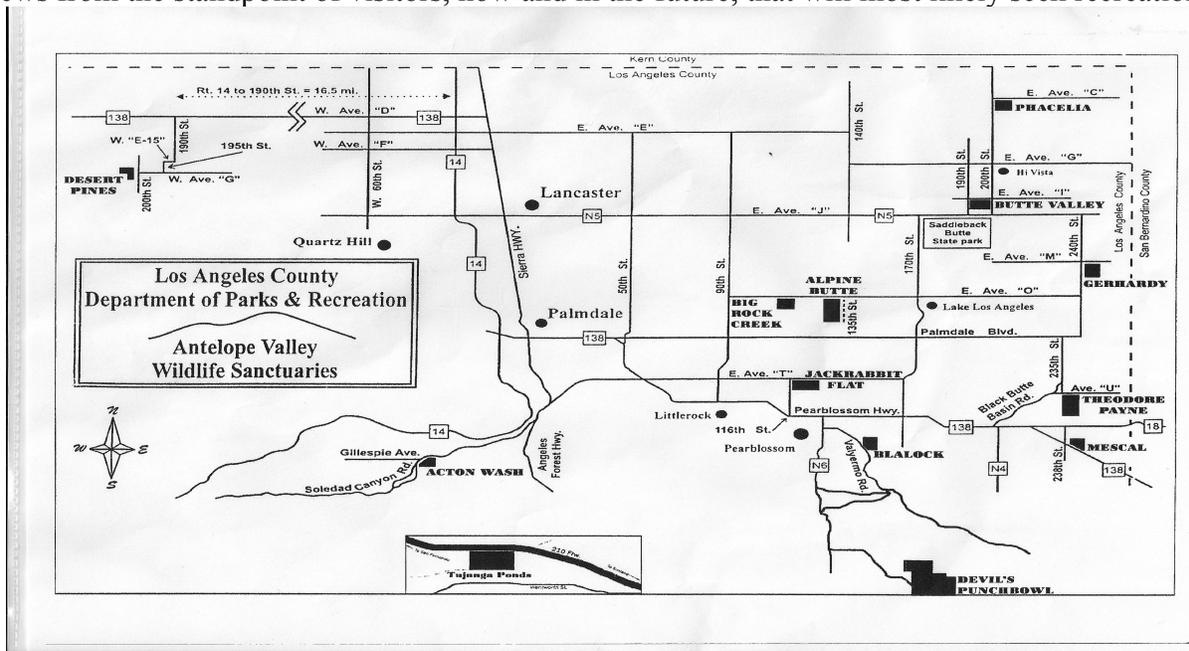
We are writing in response to the Notice of Preparation (NOP) for the Antelope Valley Areawide Plan (AVAP). Members of our town council and several residents attended the numerous Town & Country Outreach meetings that began in 2007. We felt the meetings were useful, and believed that our desires for the future development of our community and other rural town council areas were sufficiently addressed through the outreach and additions to the AVAP, but now question recent input from special interests who have no particular inclination to rural preservation touted by Regional Planning, the AVAP, their insertions to AVAP, and the NOP.

We understand that economic development is important to the future of the Antelope Valley and its residents. However, our mission, as a council, has not changed; we formed through response to an unpopular local project that has adversely affected the community, and we continue our efforts to maintain our rural atmosphere and protect our area from ill-conceived development. What is so obvious to us—is that the Western Antelope Valley and its important offering of rural lifestyle and agricultural areas, visual and recreational resource areas, and crucial wildlife areas, must be protected. Please see the list below regarding our concerns and comments that we believe require attention in the Environmental Impact Review document.

Aesthetics

Please discuss visual effects of transportation, commercial, industrial, and “economic opportunity areas” along the western portion of Highway 138 and surrounding roadways, listed in the Los Angeles County's Recreation Plan 1965, and the Scenic Highway Element 1974. Previously

mentioned current planning documents identify an extensive network of scenic roadways in the north county; proposed documents do not detail those roadways or scenic areas. With the very real possibility of increased encroachment in scenic areas from areas of increased density of proposed development (including renewable energy), we are concerned with maintaining our views from the standpoint of visitors, now and in the future, that will most likely seek recreation



and solitude in our area due to proximity to the greater Los Angeles Area. Higher fuel costs may dictate areas of local interest will support increasing numbers of visitors seeking respite in our rural areas possessing great natural beauty, adding to the economic vitality of our region through tourism. Identify potential impacts to loss of viewshed and related tourism to wildflower fields, Ripley Desert Woodland, California Poppy Reserve, Desert Pines Wildlife Sanctuary, and others listed on the map above. Consider, too, the Historic Ridge Route, listed on the National Register of Historic Places, and Angeles Forest scenic viewpoints.

Dark night skies will most likely be affected by substantial development areas and RE installations, solar fields, wind turbines, and the like. Discuss all potential development impacts to dark night skies.

Agriculture and Forest

The AVAP claims to preserve agricultural lands, yet continues to support the placement of utility-scale renewable energy on so-called “disturbed” agricultural land (ag land). How will this affect the potential of ag land to provide food sources in the future? Please explore the effects of utility-scale renewable energy (RE) development build-out on A-2 Heavy Agriculture, and A-1 Light Agriculture zoned parcels. Explain impacts that arise from conversion of farmland to non-agricultural use, as proposed by promoting utility-scale RE and commercial/industrial uses in

agricultural areas. Thousands of acres of proposed RE projects will have tremendous effect on neighboring rural residents, rural communities, and natural areas; explain impacts of this objective.

Increased housing densities recommended by land use policies directing all future growth to rural communities and rural town areas, and those along the San Andreas Significant Ecological Area that border the Angeles National Forest must be assessed for their effects on residents whose land adjoins or is near Forest Areas. Most of these lands are extremely high fire hazard areas, earthquake fault hazard areas, watershed areas, as well as wildlife habitat. Increased fire danger to Forest areas adjacent to industrial and high density housing will occur, i.e., expansion of urban-wildland interface and correlative increase in human induced ignitions and increased use in general. Also, evaluate scenic viewpoints and Scenic Byways from Forest lands that will be impacted by proposed land uses and development.

How will changed land use, air quality, traffic, and added recreational use affect the Angeles and Los Padres Forests, and including Fish Canyon, Salt Creek, and Frazier-Sespe Wilderness Areas proposed by the new Southern California Forest Management Plan?

Air Quality/Greenhouse Gas Emissions

Air quality issues have been ongoing in the Antelope Valley. Particulates are often above acceptable levels, and westerly winds drive pollutants and dust into and around the Antelope Valley. Residents here have been subjected to air pollution from hazardous waste fuels burned by the National Cement Company. Bakersfield and the Central Valley have some of the worst air in the country, and air pollution drifts into the Northern Antelope Valley. Addition of approximately one hundred thousand people, at Centennial's build-out, will encourage commuting and other traffic, and along with industrial and commercial development, will add pollution. Added traffic in the Interstate 5/ Highway 138 zone could load the Tejon Pass and Northwest Antelope Valley with pollution that will affect sensitive receptors.

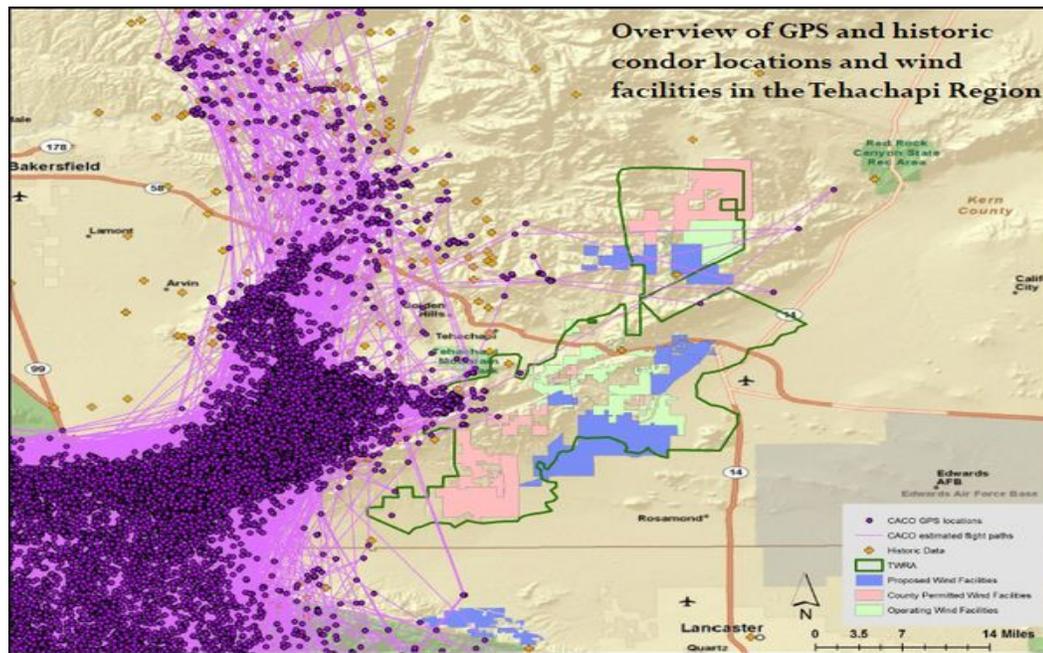
Recent studies have revealed that arid environments have value in their ability to sequester greenhouse gases. Those landscapes may well sequester even more greenhouse gases as the amount of carbon dioxide in our atmosphere increases. Address the use of desert environments for utility-scale solar and urban-suburban sprawl, and the loss of this ability to convert CO₂.

Please explain how greenhouse gases, automobile pollutants, energy generation, industrial uses, particulate matter (which carries Coccidioidomycosis—Valley Fever) will affect air quality in the North County, while viewed through the lens of projected build-out.

Biological Resources

Examine effects of land use and zoning changes to the Western Antelope Valley, which the Audubon Society identifies as a globally Important Bird Area. Explore the effects of thousands of acres of utility-scale renewable energy development; commercial, industrial, and housing

development on migratory passerines, raptors, and waterfowl that frequent the Antelope Valley. Consider the effects of Centennial's development, as California Condor territory, near Critical Condor Habitat.

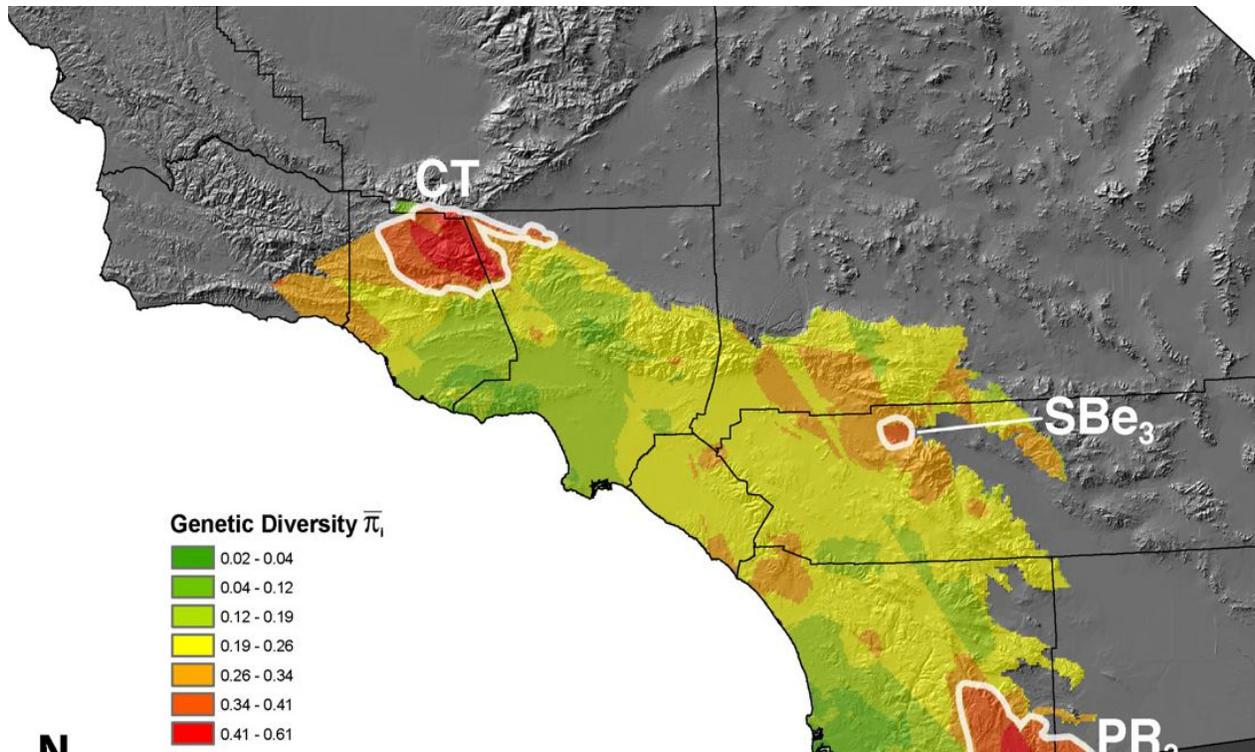


Detail impacts of high density and industrial development in the proposed Centennial area, to the San Andreas Significant Ecological Area (SEA) 21, encompassing this development along with the proposed “economic opportunity zone” in the North Western Antelope Valley. How does the land use map for this area comport with low density development in SEAs? The designation of this area as an SEA recognizes its importance as a major wildlife corridor that connects the San Gabriel, Sierra Pelona, Central and Northwestern Transverse Ranges, and Tehachapi Mountains. The United States Geological Survey recognizes this area as a biological “evolutionary hotspot”-- crucial to biodiversity; so, explain how development here will affect this important aspect of the environment.

This corridor, and mountain/valley floor areas may also be considered “transitional habitat,” crucial to species ability and opportunity to move up and down elevations in order to adjust to changes in temperature, as possible climate change takes place and warming (from local development) encroaches on valley environments. So, far no EIR document has specifically discussed the urban heat island effect of large-scale solar development or wind towers, or addition of other development and how they may heat our desert valleys, and make the need to preserve these areas more urgent. Describe urban heat island effect of development as a result of the AVAP and Land Use Map changes.

Utility-scale solar development is considered by California Department of Fish and Wildlife as complete loss of habitat for sensitive species in the Antelope Valley. Address impacts of thousands of acres of of this type of development.

“Are hotspots of evolutionary potential adequately protected in southern California?,” USGS, April 2008.



Economic/Jobs

We have reservations about the targeting of rural areas for industrial development. Please explain the consistency of AVAP rural preservation and the promotion of utility-scale RE, other energy production, and industrial uses incongruous with rural communities. The “Economic Opportunity Areas,” especially the Western Antelope Valley zone, which is situated in the previously mentioned wildlife corridor, the SEA 21, and where there is essentially no development in the area now. What would be the effects on local businesses in Gorman and Lebec? If one considers those areas as economic opportunity or commercial development zones, why have they not become more developed to date? These areas are not serviced by any mass transit, the proposed High Speed Rail will not travel through the West Valley; please tell us how more individual commuters on our roads and highways will affect local residents. Typically, no suburban area in Southern California has been able to rely completely on local employment opportunities, encouraging reliance on automobile commuting, in turn, causing increased traffic on local roads and highways.

The Eastern Highway 138 road widening effort has not produced an economic boon to the Eastern Antelope Valley; describe how the new industrial zones would benefit local residents, when current commercial zones along the highway have fallen into decay, and the additional commercial and industrial development directed to the proposed High Desert Corridor will likely spell further demise. How does this plan affect current local business?

Hazards

Special Hazards Management dictates low density housing in fire, earthquake, and flood zone areas. Many rural communities, suburban and municipal development occur along the San Andreas Rift Zone. Our community has requested large lot size minimums to not only preserve rural living and environmental quality here, but we understand high density development puts increased numbers of residents at risk during hazardous events. What are impacts to residents in areas of high density housing (Centennial) planned for the Western Antelope Valley, at the intersection of the Garlock, San Andreas, and Big Pine Faults?

Explain impacts from increased fire danger, due to increased proposed development, in light of the fact that services usually lag behind need.

There is no countywide comprehensive flood control plan. How will increased development of housing, industrial, utility-scale RE, areas affect flood zones and adjacent properties that currently do not experience flooding issues requiring flood control plans.

Hydrology/Water

Explain how adequate water supply will be available to support increased housing, commercial, and industrial uses in light of the current water adjudication, historic overdraft of the Antelope Valley Groundwater Basin, and additional pumping by water purveyors during periodic and predictable drought. Detail effects of potential pumping that will accommodate proposed growth and Economic Opportunity Areas and dropping water levels on local existing residential wells. Additional pumping may dry up seeps, springs and vernal pools, thereby affecting local wildlife and natural environments. How does the AVAP protect water quality for humans and wildlife? How will the AVAP assure these water resources continue to exist and allow major projected growth in rural areas? There are finite supplies of water in the county and the state with increasing competition for those supplies. How does the AVAP envision adequate water supply and at what cost to existing water users?

Noise

Please consider the effects of increased traffic and diesel truck transport, highway expansion, and industrial development in light of EOAs, and insertion of industrial and commercial areas in rural towns and areas. Also, individual renewable energy systems, utility-scale RE installations create increased noise levels; how will they affect unincorporated county residents?

Land Use

Please explain how first indicating that land use policy will “direct[s] new investment to areas with existing services and facilities and away from areas with natural hazards and environmental resources” with the insertion of Economic Opportunity Areas (EOA) and high density housing and industrial development in the proposed Centennial area, where no services or infrastructure exist at the present. The same can be said of Neenach and its proposed EOA. This is leapfrog development

of the worst kind. The area at the crux of Interstate 5 and Highway 138, with water resources at Quail Lake, a major wildlife corridor, and essentially no development of any kind does not align with policies that promote transit oriented areas or infill development with existing infrastructure and public services.

Directing a majority of growth to unincorporated areas, rural town centers, and rural town areas is antithetical to the original intent of protecting rural communities like ours from development we do not want and has diminished our efforts to the Town & Country outreach program. Discuss the effects of directing a majority of Antelope Valley growth to outlying areas. Would this create even more commuter traffic and transit issues in rural areas? Winter closures due to inclement weather often close the major Interstate 5, and drivers looking for a way around closures converge on rural roads unfriendly to unknowing travelers. How will increased population, more industrial development, and the Highway 138-High Desert Corridor creating massive truck traffic from the proposed "inland port" transportation hub affect rural residents? How does this comport with AVAP Policy that suggests land use patterns should reduce the total amount of potential development requiring vehicle trips in the unincorporated Antelope Valley, to decrease greenhouse gas emissions?

How would a majority of new residential development located between rural town centers and rural preserve areas provide appropriate buffering, infrastructure, and services in areas in which there are fewer services, currently. Strangely, the policy description states, "These areas will provide transportation linkages to rural town center areas and other nearby destination points, as directed in the policies of the Mobility Element." Ironically, development increases the need for public services and infrastructure that the AVAP says rural residents must choose to live without in order to preserve their lifestyle. How does this work?

There are issues with allowing the Centennial project to request land use and zoning changes to circumvent their specific plan submitted to Regional Planning. If RP was inclined to approve the specific plan, why would Tejon Ranch-Centennial approach land use mapping via the overall planning process? The public is denied a comprehensive environmental review of the total build-out area. If the land use and zoning desires of the Centennial area are approved, then a "piecemeal" approach of phased building would ensue. Cumulative effects would be considered on a first-come basis, with successive individual projects carrying incrementally more burden of significant impacts, allowing initial projects the benefit of "no cumulative impacts." Is this a violation of California Environmental Quality Act, since the specific plan existed and was in process prior to request for land use mapping changes? Residents, here, were promised an EIR at least two years ago that was never released. The map of the area conflicts with the premise of rural preservation; low density, scattered rural development in outlying, unpopulated areas, SEAs, Special Hazard Areas, Forest, recreation, and conservation resources, and areas with little infrastructure and public services. Please explain how this is congruent with surrounding land use, and how this project's intense development intentions will avoid concomitant sprawl and adverse effects to nearby local communities.

Mr. Carl Nadela

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We appreciate the opportunity to comment, and look forward to participating in the environmental review process as it relates to the AVAP. As you see, we have many questions regarding the plan, its effects, its consistency with purported preservation of rural communities, and the value of our input as it pertains to Regional Planning documents that will certainly affect our area of the unincorporated Los Angeles County.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Zahnter". The signature is written in a cursive style with a large, looping initial "S".

Susan Zahnter
Vice President