TriCounty Watchdogs
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July 9, 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, CA90012
Email: tnc@planning.lacounty.gov

Dear Mr. Nadela:

Subject: Notice Of Preparation, AntelopeValleyAreawide Plan

We write in response to the Notice of Preparation (NOP) for the Antelope Valley Areawide Plan (AVAP), having attended the recent outreach meeting in Lancaster. The TriCounty Watchdogs are an environmental organization whose mission is to protect natural and cultural resources, and promote ecotourism and responsible growth in the Frazier Mountain Communities area near the GrapevinePass that connects the San JoaquinValley and northern California to Southern California. We are your neighbors.

We know that development provides economic opportunities for businesses to expand, new ventures to form, and provide employment for nearby residents to earn a paycheck to spend in the community. These opportunities are offered by the prospect of a new city like Centennial.

We insist, however, that the Centennial project prepare an Environmental Impact Review to illustrate how it will be a responsible neighbor to important rural and agricultural areas.

1. Aesthetics

We understand that work has previously been done to designate portions of Highway 138 as a scenic highway, thus limiting commercial and housing use. In addition, please review these plans and discuss the idea of a view corridor as well. It is our understanding that the land across Highway 138 nearest the proposed Centennial is light industrial, meaning office buildings. We would like to see that light industrial use sited on Tejon land itself, and not in current or proposed Significant Ecological Areas.

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.

We are concerned that areas designated along I-5 as CR (Commercial Rural) will become the "fast food alleys" that already blight the Frazier Mountain offramp area.We would like more information on the Economic Opportunity Area sited near Gorman, in particular its impact on current businesses in Gorman and the surrounding area.

Please identify potential impacts to loss of viewshed which brings visitors to wildflower fields, Ripley Desert Woodland, California Poppy Reserve, Desert Pines Wildlife Sanctuary, and others listed on the map.Consider, too, the impact of Centennial City looming over the Historic Ridge Route.

We would like to see discussed as well the impact of intensive development , RE installations, solar fields, wind turbines, and the like on dark skies and the tourism it brings to the Mt Pinos areas.

Similarly, we are concerned how the plan mitigates the impact on significant ecological areas in the RL1 area south of the Economic Opportunity zone and west of Centennial and north of Quail Lake.

2. Air Quality

The TriCounty Watchdogs would like to see discussed the following issues in relation to air quality.

Agriculture Buffer Zones to protect air quality: As there is a need for safe buffer zones from major goods corridors, there is also a need to protect people from the air pollution of aerial spraying of pesticides in agricultural areas. We ask you todiscuss an AntelopeValley quarter mile buffer zone to include all sensitive sites listed.

Goods Movement Corridors: Please discuss ensuring a major roadway buffer zone of at least 500 feet when constructing homes, schools, hospitals, nursing homes etc. that will maintain vulnerable populations (young, elderly and those with compromised health.) Particulate matter in the air near highly trafficked roads damages the health of all who live, work and play near them. This damage is severe in the case of children, ill people, and those with compromised immune systems.

We ask you to discuss the planting of trees or block walls near major roadways to reduce emission exposures to already existing sensitive sites as stated above. Antelope Valley already suffers from poor air quality.

Stronger air quality standards should be established for communities bordering highways and large renewable energy projects. TCW asks that an Ultra-Fine Particle air quality analysis be performed by The Antelope Valley Air District as a baseline for future monitoring. In addition, we ask that you discuss siting air pollution monitors along I-5, proposed economic opportunity areas, and commercial and industrial development areas, monitoring for diesel particulates. Ultra-fine particulate matter should be included in what government and health agencies report.

If air pollution levels exceed health based thresholds, nearby homes, businesses and schools should be notified.

3. Biological Resources

The areas radiating out from the intersection of Hwy 138 and I-5 represent the merging of five major biological regions. This crux is the center of more distinct biological regions (or biomes) than in any other location in California. Maintenance of interconnection between these natural regions is paramount so that gene flow can continue to proceed among all groups of organisms found naturally in the regions. With serious climate changes imminent, unhampered gene flow becomes all the more important as species need to move in order to survive.

These natural regions as defined and delineated by Allan Schoenherr in A Natural History of California, University of California Press, 1992, include: 1) The Sierra Nevada Mountains represented at its southern end by the Tehachapi Mountains (which end westward at I-5 in the grapevine area, and southward within Tejon ranch north of Hwy 38), 2) the Mojave Desert which ends at a pointed wedge from the Mojave/Lancaster area to I-5 at Hwy 138, 3) The Transverse Mountains coming westward from San Bernardino Mtns through San Gabriel Mountains, and heading on out through Ventura and Santa Barbara Mtns into the Channel Islands (the area of I-5 between Hwy 138 and Hwy 14 passes through this range), 4) the Coast Range, which comes south from the Eureka/Redding line to San Luis Obispo/Santa Barbara border, then east to include Mt Pinos - Frazier Mtn - San EmidgioMtn-Tecuya Ridge and stop at I-5, and 5) the San Joaquin Valley ending at the base of the Grapevine grade on I-5.

In 2002, a workshop was held in Frazier Park to address bioregion interconnectivity issues indicated above. We include as Appendix 1 an abbreviated sample of some of the remarks made by experts at this workshop concerning the need for bioconnectivity in this region.

Consider the impact of Centennial's development on California Condor territory. Elaborate for us how high density population and industrial development in this area will affect the San Andreas Significant Ecological Area (SEA21) as well as the proposed "economic opportunity zone" which, because of its nature and its location, is so vague as to be alarming.

Utility-scale solar development presages a total loss of habitat to sensitive species. This is a major concern for TCW.

3. Cultural Resources

These lands were used by Native American peoples for centuries, and we expect thorough preservation of all artifactsand burial sites. These cultural resources must be taken into consideration during the preparation of the EIR.

4. Geology/Soils

Ileene Anderson, California Native Plant Society – *Linkages from a Plant Perspective*

This is taken from 2003 remarks

Ileene Anderson, now with Center for Biodiversity made the following statements:

§ There are many ways in which linkages favor long-term plant persistence
§ Linkages are essential for pollination; wind and water transfer pollen between populations for some species, but wildlife movement is needed for pollination of many plants; linkages reduce effects of fragmentation; recent studies have shown benefits of corridors for plants, particularly through insect pollination
§ Dispersal of seeds, other plant materials, and spores is also a linkage issue, accomplished by wind, water, erosion of unstable soils, and critters (including insects) that cache seeds, ingest them, and otherwise move them around
§ Rare plant studies show that substrate-specific species live in naturally fragmented landscapes; linkages between such sites are important for seed dispersal and pollination
§ Disturbance regimes (fire, flood): if vegetation is wiped out and propagates destroyed, linkages are essential to allow return of native plant material to site
§ Geologic timescale: plants move around over time; connectivity is important for long-term persistence of vegetation communities; plants need linkages to move around as they have historically to disperse across the landscape in response to global changes; must consider elevational and latitudinal linkages
§ Study area includes Transverse Ranges, Great Valley, Tehachapi Mountains, and Southern Sierra Nevada Mountains, and is a meeting area for multiple ecoregions / ecotones leading to great botanical diversity; plant species of Carrizo Plains were evolutionarily connected to western deserts (consider long-term geologic timescales)
§ CNPS manual of California vegetation identifies plant communities at lower levels as series, alliances, or associations; overlapping habitats result in hundreds of such series in the linkage planning area (and many have not yet been identified due to limited access); some Pleistocene relicts include great basin sagebrush and blackbrush scrub, which need connectivity to remain viable into the future
§ Photographs shown: great basin sagebrush, California juniper association (threatened by increasing human activity and fire occurrence), San Gabriel Mountains, desert scrub, Joshua tree woodland (not adapted to fire - causes type conversion to desert scrub)
§ In the southern Sierra Nevada Mountains, hydrology and soils dictate naturally occurring fragments of mountain meadows in pinyon forest; alluvial processes provide opportunity for movement of plant propagules
§ Botanically exciting area with localized populations of possible undescribed species (such as new onion found on pebble-based soils with no exotic weed competition); substrate-specific rare plants present
§ Linkages encourage plant movement, but may also allow spread of exotic weeds; corridors with disturbed habitats may allow invasive plants to exploit resources
§ Some plant communities require fire for persistence (such as chaparral); desert plants not adapted to fire, and may type convert to support invasive species
§ In San Gabriel Mountains and Great Valley, nitrogen deposition from poor air quality may effect vegetation by supporting exotic species over native vegetation

In addition, conversions of farmland to thousands of acres of renewable energy projects have

already had, and will continue to have, huge impacts on surrounding residents and communities. Please discuss the objective in light of these disturbances on local areas.

5. Greenhouse Gas Emissions

Please discuss the cumulative impact that increased traffic servicing the population of the proposed Centennial project will have. Please provide responsible estimates of the impact of another one hundred thousand residents driving to far-off employment when air quality is already compromised.

6. Hazards and Hazardous Materials

Please discuss a heavy industry buffer zone surrounding the cement plant, in addition to proposed land use changes designating light industrial uses in the Western Antelope Valley.

Heavy industries, such as the cement plant, are a suspected source of air pollution and there must be sensible buffer zones in place to protect residents who may live, work, or go to school near these sources of toxic pollution. Rubber tires are burned at the cement plant as fuel. What becomes of that toxic smoke and particulate matter released into the air?

7. Natural Resources: Water

Our fragile and finite supply of water is the most critical subject of all. If the drought and global warming continue, Los Angeles will have to desalinate the ocean to supply any substantial development for many years to come.

Many communities on the edge of the plan area are losing their water sources. They are having to buy and transport water from other water municipalities. Big businesses are water-banking public water sources for the future to sell to the highest bidder. Agencies are already in litigation on the control of the state aquifer water supply. What over-burdened agencies are going to oversee this complex transfer of water, and what enforcement teeth will they have to ensure a fair and affordable supply?

Please discuss the water quality issue if water is being transported from different and far off sources. What agency will regulate these transfers? Communities which have contracted for a supply from a developer or other sources are reaching the end of those contracts. Similarly, new developments are signing, or attempting to sign, contracts to build new communities. What happens when those contracts reach an end and communities discover they have to come up with new—and very expensive—water supplies? Again, we stress our awareness that water is finite.

In particular, we would like Tejon Ranch Company to detail how scarce water will be guaranteed to hundreds of thousands of *future* residents. This is a matter for an Environmental Impact Report and the reason for our insistence that this critical matter not be subsumed in this AVAP.

Please also discuss water allocation resources and how long-ago state contracts have allocated those supplies. It is time to push for a review of the current distribution of water and plan for the emerging and future competitions for water to supply agriculture, development, industrial uses.

Please discuss how the current drought affects those allocations. Use responsible estimates to project how a continuing drought might affect the competition for this scarce resource.

Wells have gone dry in Lockwood Valley, in Gorman, and in many places in the Central Valley. The entire community of Lake of the Woods is importing water. Lebec has had trouble with its water supply, and the Frazier Park Estates development in Lebec foundered because the developer could not find water to support his plans. We question also whether water is adequate to supply the new businesses that will be built in the Commercial Rural sections along Interstate-5.

Centennial will alter our communities forever. We are unconvinced there is water to service this new leapfrog development in perpetuity. Water can be deviated or purchased, but there is a finite supply. If it is taken to supply a very much for-profit enterprise, it is taken from somewhere else. Fine new homes and roads can be built, but will grass be growing up in the living rooms when the taps run dry?

8. Population/Housing

Please explain how Centennial City, built in a rural and agricultural area, will benefit current residents in surrounding communities. Regional governments approve projects thinking they are “providing jobs” in what they seem to consider "empty land". The current residents are not crying for this empty land to be improved. Real estate and development folks will prosper. Please discuss how current residents will prosper from these huge alterations in our communities and way of life.

9. Public Services

We know from living here what a thin carpet of public services Kern, Ventura, and Los Angeles County lay over the land at present. Please discuss how counties which are already strapped for cash will provide adequate schools, hospitals, police, and fire services for an enormous future development.

10. Transportation/Traffic

The TriCounty Watchdogs’ (TCW) work focuses on the mountain communities, a string of villages that lead away from Interstate-5twenty miles upward into the transverse range that defines the southern end of the San Joaquin Valley. This area overlaps Kern, Ventura, and Los Angeles Counties.

These communities are in the vicinity of the I-5 Highway, which connects the Central Valley of California with southern California. Approximately 70,000[1] vehicles, of which an estimated

[1]California Dept. of Transportation, 2010 AADT, Los Angeles/Kern Co. Line (Line 637).

18,000 are large trucks with diesel-fuel engines, travel through a narrow mountain pass, through the communities of Gorman and Lebec, California per day.

Residents attending public meetings have voiced concerns about the visible dirty air that drifts up a narrow canyon connecting the San Joaquin valley floor to the Frazier mountain communities. Due to the topography of the area, air pollution collects in the narrow canyon. Air quality is further compromised by the heavy truck traffic that passes through the communities on I-5. Residents are concerned about the incomplete data on ozone suggesting that their children's asthma and severe allergies may be attributed to air pollution.

Residents of the proposed Centennial project must commute to far off workplaces. There are no big box stores for shoppers nearer than Santa Clarita.

Residents of our communities are well aware of the frequent closures of I-5 to traffic in the winter. These disruptions tie up the continuous river of cars and trucks for hours and for miles in each direction, and pour traffic onto less accommodating rural roads in our communities. Traffic density can only increase. Adding lanes goes only so far. Please discuss how the infrastructure will accommodate this increased traffic burden and deal with the complexities of winter weather.

11. Utilities/Service Systems

There is a viewpoint on Gorman Post Road which shows where the nexus of the Garlock and San Andrea Fault collide. An important natural gas facility is located here and the electricity grid marches across the valley. The I-5 runs right next to the Aqueduct. We are told that the prospect of a regional disaster knocking out electricity, water, gas and transportation could happen any day. Please discuss how the plan will provide emergency services for an extended period of time.

We join with other small communities across the I-5 in foreseeing the long shadow of approaching sprawl, drains on our water supply, a worsening of air quality, threats to our cultural and historical heritage, and our economic opportunities being centralized around the leapfrog building of the city of Centennial.

We understand that Tejon Ranch has been working with LACo. Planning to have their development plans integrated into the Antelope Valley Areawide Plan Land Use Policy Map, thus circumventing the Specific Plan they originally submitted to LA Co. years ago. We want to see an EIR released for the Centennial Project. Please move forward to see the Centennial project detached from the plan and an EIR submitted for community study.

Sincerely,

Mar Preston
Vice-President
TriCounty Watchdogs

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http://traffic-counts.dot.ca.gov/

Please confirm that this communication as well as attachment was received July 11, 2014 as county offices are closed.

AVAP Appendix 1

I am including an abbreviated sample of some of the remarks made by experts at this workshop concerning the need for bioconnectivity in this region.

The process of determining future development/protection for the western end of Antelope Valley through which Hwy 138 runs, and particularly in the immediate area of the proposed Cenntenial City is crucial. The EIR for the General Plan should deal with this very carefully and thoroughly.

South Coast Missing Linkages Workshop Minutes
September 30, 2002 at the Frazier Park Recreation Building

Below are a few of the topics covered by knowledgeable speakers.

Rick Rayburn, California State Parks – *Welcome and Opening Remarks*

Mr. Rayburn has been Chief of the Natural Resources Division at California State Parks since 1986.
Some of his points made at the Workshop include the following:

- ♉❒♎ ☼♋♲♌◆❒■ participates in acquisition planning for State Parks, Wildlife Conservation Board, and California Department of Fish & Game; South Coast Missing Linkages Project is crucial to this (most important acquisition planning effort going on in the state)
- Many biological reports discuss habitat fragmentation and conversion, and the need to establish linkages to maintain biodiversity, but recommendations are lacking in how to overcome obstacles and actually plan for connectivity
- For major land managing agencies in California (including the military), land acquiring agencies, and nonprofit organizations, fragmentation is a difficult issue to address
- Most linkages involve lands connecting areas that have already been preserved due to on-site habitat values; there is less enthusiasm to protect connective habitats as they may seem less desirable based on habitat characteristics
- Connections necessary to protect previous investments in preserved areas
- Acquisition planning is limited throughout the state; usually driven by opportunity purchases, lacking thorough assessment; this project will establish locations of important habitat linkages based on biological needs of focal species and practical design, not just according to cost and opportunity
- Next round of workshops will involve land planners and agents for conservation design
- California State Parks' top acquisition program objective for natural resources is maintenance of landscape linkages, which will support quality of already protected lands; this timely effort will identify key areas for land purchases and conservation easements
- This project will also help agencies enforce laws to avoid subdivision and land conversion in priority connectivity areas to allow wildlife movement

Paul Beier, Northern Arizona University – *Regional Overview of Linkage Planning Area*

Some of his points made at the Workshop are as follows:

- San Gabriel - Sierra Madre Mountains: this linkage is seriously threatened and needs swift action to maintain a connection; no continuous natural routes exist across SR-14 (100 to 300-foot filled slopes with no bridges); break is 4-7 miles wide between Angeles National Forest protected lands; two potential corridors for terrestrial wildlife discussed:
    - Route through Soledad, Bee, Spring (quiet underpass), Agua Dulce (busy underpass) and Tick Canyons; about ¼ mile wide at narrowest area; will be challenging for animals to move through corridor while avoiding developed areas
    - Ritter Ranch route crosses SR-14 at major highway interchange that will be difficult to span, with railroad tracks, access roads, parking areas, and trenches
- Eastern - Western Sierra Madre Mountains: crossing I-5 between Angeles and Los Padres National Forests is main concern; no bridged streams; filled slopes along I-5; only large vehicle underpass is on private property (Canton Canyon); second vehicle underpass is large box culvert (gravel dispenser); third possible option is bridge or over-pass at Cherry Canyon (lots of deer here); these routes connect to Piru Creek
- Sierra Madre - Tehachapi - Sierra Nevada Mountains: million-acre core habitat area
    - I-5, SR-138 and aqueduct are barriers in southern area; six small box culverts present; triangle of land at quiet, well-bridged highway interchange is undeveloped and prime candidate for connectivity between Angeles National Forest, Tehachapi foothills and Hungry Valley SVRA – also includes Gorman Creek riparian area; fenced aqueduct and overflow canal are serious barriers
    - SR-58 is movement barrier for terrestrial wildlife in central linkage area; 3 quiet vehicle underpasses present; 5-foot-high concrete divider down center of highway; heavy traffic; some bridges and one paved overpass exist near Tehachapi, where much natural habitat remains; BLM owns land located east of Tehachapi near three good underpasses (Cache Creek, Sand Creek Rd, railroad) and one overpass (Cameron Rd, where Pacific Crest National Scenic Trail crosses); potential corridor leads through windfarms

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