



July 31, 2014

Mr. Richard Bruckner
Director of Planning
Los Angeles County Department of Regional Planning
320 West Temple Street - 13th floor
Los Angeles, CA 90012

Dear Mr. Bruckner:

The Los Angeles County Farm Bureau (LACFB) appreciates the opportunity to express our concerns about moving the General Plan and the Significant Ecological Area (SEA) and Hillside Management Area (HMA) ordinances forward prior to the adoption of the Antelope Valley Area Plan (AVAP).

The entire process appears to us to be highly unprofessional and in violation of some of the major axioms of an effective planning procedure. For instance, the main factors that should be considered in drafting the AVAP are not considered even though the LACFB and others have been attempting for years to bring these considerations to you and your staff's attention. One notable example is the effect of the Antelope Valley Groundwater Adjudication on the AVAP. 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 AVAP is not considered. We feel it is absolutely essential to provide a thorough and complete discussion of these issues in the AVAP.

Secondly, your department appears to desire to bring the SEA and HMA ordinances forward before the AVAP is adopted. This approach is tantamount to building a shaky house-of-cards without a foundation such as the AVAP. Unfortunately, because of the insistence of your Department to not recognize important issues, the AVAP today is also shaky.

We believe it is premature to consider adoption of the SEA and HMA Ordinances before a number of Los Angeles County Area Plans are adopted. The Area Plans should provide important backbone to these Ordinances. Any discussion of these Ordinances should be continued until adoption of these Plans by the Board of Supervisors.

We also object to the Countywide General Plan and AVAP being pushed forward on parallel schedules. This process precludes careful review and comment by the public.

The LACFB Board of Directors, our members and the general public feel very threatened by the AVAP because it threatens to destroy property values and in many cases, life savings and operating capital. Therefore, we request a meeting with you and your staff to discuss the important issues in this letter and letters LACFB has already sent to you and your staff.

Thank you for your consideration.

Yours truly,

A handwritten signature in blue ink that reads "Eugene B. Nebeker". The signature is written in a cursive style.

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

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