

Blue Ribbon Committee

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LA County Farm Bureau

August 1, 2014

Richard Bruckner

Director of Los Angeles County Regional Planning

320 West Temple Street, Room 1356

Los Angeles, CA 90012

RE: Antelope Valley Area Plan, General Plan and Major Ordinance Updates

Dear Mr. Bruckner:

The members of the Blue Ribbon Committee take this opportunity to express our concern with the efforts of the Los Angeles County Department of Regional Planning (DRP) to continue processing the countywide General Plan Update before hearings and adoption of the Antelope Valley Areawide Plan (AVAP), in apparent defiance of the motion made by the County Board of Supervisors (BOS) just 7 weeks ago.

As a group working in good faith with the DRP for three years, the manner in which the current draft AVAP is being presented to the community is very disconcerting and we have the following questions for which we request your response:

- With the abbreviated time allowed for adoption of the AVAP, opportunities will be very limited for changes to the plan which may be suggested by land owners and interested groups reviewing the plan. For this reason, we ask why do the county departments have separate internal circulation in the time frames rather than responding to the draft Environmental Impact Report (EIR) during the statutory review period of 45 days?

- In addition, as the EIR for the General Plan Update had previously included the area of the Antelope Valley and now that the AVAP is being processed separately, why would you require a duplicate review internally? Until the Board called for a separate EIR for the AVAP the DRP would have accepted the General Plan EIR as the AVAP EIR, therefore it follows that since the General Plan EIR has been released the EIR has been reviewed internally. If this

review was eliminated or run concurrently with the public review, several weeks of time for review and community input could be saved. We are asking "Why is this internal review being repeated a second time?"

- Why has the plan not been released in its entirety? The BOS passed a motion for a separate EIR for the AVAP in June of 2013, DRP did not move forward on that motion until pressed through a second motion in June of 2014 and we are still waiting for additional portions of the plan. The question to you is "Why is there an ongoing delay in the release of all portions of the AVAP so the plan may be appropriately vetted by the community?"
- The Blue Ribbon Committee is a community based group which formed and was acknowledged by the 5th District in 2011 to provide input to the preliminary draft plan, in addition to input contributed by area Town Councils. We have endeavored to provide input to the plan that encompasses areas other than those covered by the Town Councils. Through our prior work with you and the DRP, we developed and provided a land use map for three reasonable economic growth opportunity areas. Additionally we provided suggestions for other areas which were

not adequately addressed in the *2011 Draft Town and Country Plan*. While we appreciate the inclusion of the land use map which we developed for three areas which have been identified to meet the growing needs of the Antelope Valley, we became very concerned when we read the policies in Chapter 2 of the Draft Plan which require a complex and confusing scenario before development can take place in these areas. We are especially concerned about the requirement for a "Community Plan" prior to development in these areas. The questions we would like a response to are:

1. Why is the DRP requiring another Community Plan for these areas, rather than following the State of California Subdivision Map Act as has always been done?
2. Won't the delay generated by creating additional "Community Plans" hinder the ability to obtain transportation grants or move appropriate projects forward?
3. How can an accurate EIR be written for this plan which includes a count of the jobs and housing units in these areas if they still require a community plan?
4. Why did the DRP draft an Area Plan which immediately necessitates the development of additional plans and subsequently amendments to the General Plan?

Other concerns with this plan and the current process for which we would like a response are:

- What is the rationale behind designating an additional 150,000 acres; an increase of over 107% in Significant Ecological land in the Antelope Valley?
- Who did DRP consult with before recommending support of the proposed California High Speed Rail system as found in the Mobility Element policy M 6.5 and Policy M 6.6? Why are these policies even in the area Plan?
- Why does the Plan not include the proposed High Desert Corridor project and its proposed alignments?
- And finally: "Why is the General Plan continuing to proceed before the pending area plans are completed? Shouldn't the General Plan be amended in accordance with the adoption of area plans recognizing these area plans?" We believe this was the direction the Board provided with their motion in June and we would like to know why you believe it is appropriate to schedule hearings before the Planning Commission on the General Plan and its attendant SEA and HMA ordinances prior to adoption of the AVAP in defiance of the Board's motion?"

As a group, the Blue Ribbon Committee is very concerned with the lack of consideration of the Department of Regional Planning on the amount of work they are asking residents to complete in a very short period of time and why DRP isn't following the directives of the Board of Supervisors.

We look forward to your responses to these questions and remain willing to work within the timeframes established by the Board of Supervisors for the AVAP, but do not support the continued General Plan efforts by DRP at this time.

Sincerely,



Harvey Holloway
Co-Chair
Blue Ribbon Committee



James D. Vose
Co-Chair
Blue Ribbon Committee