October 6, 2014

Sent Via Email

Mr. Carl Nadela, AICP
Los Angeles County Regional Planning
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Subject: Comments on DEIR Antelope Valley Areawide Plan on behalf of Friends of Antelope Valley Open Space

Dear Mr. Nadela,

Concerning the AVAP DEIR, would like to comment on conflicts between the South Coast Missing Linkages Project and the proposed West Economic Opportunity Area; the importance of adoption of SEAs extensions as originally proposed; and contributions of unobstructed vistas and dark night skies to the tourism economy of the Antelope Valley.

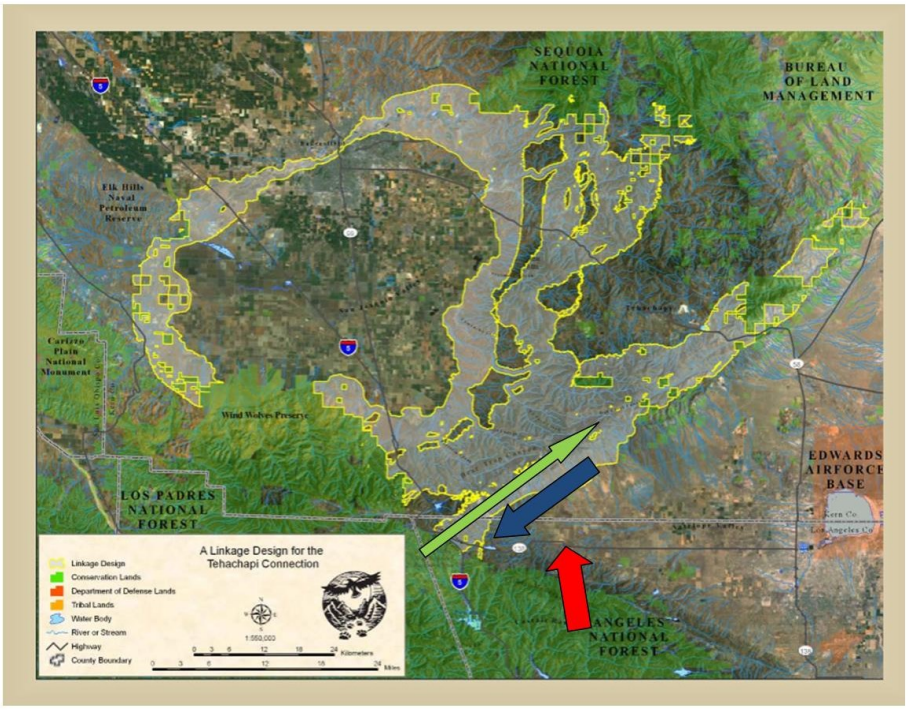
SEAs, South Coast Missing Linkages Project and the West Economic Opportunity Area:

We strongly support the adoption of the proposed additions to the Los Angeles County Significant Ecological Areas *as originally proposed.* Specifically, we support the adoption as proposed of the San Andreas SEA and Joshua Trees SEA.

The San Andreas and Joshua Trees SEAs address the important issue of connectivity between virtually all major California protected wildlife areas, providing the only unimpeded wildlife corridors between the forests of Southern California and the Tehachapi, Sierra Nevada and Cascade Ranges to the north. The importance of this wildlife linkage is documented in Section G of the DEIR which includes the **South Coast Missing Linkages Project**, a project endorsed by a coalition of private and public entities including the U.S. Forest Service, California State Parks, Wildlands Conservancy, National Park Service, the Nature Conservancy and others. In reference to the Tehachapi Connection this document states:

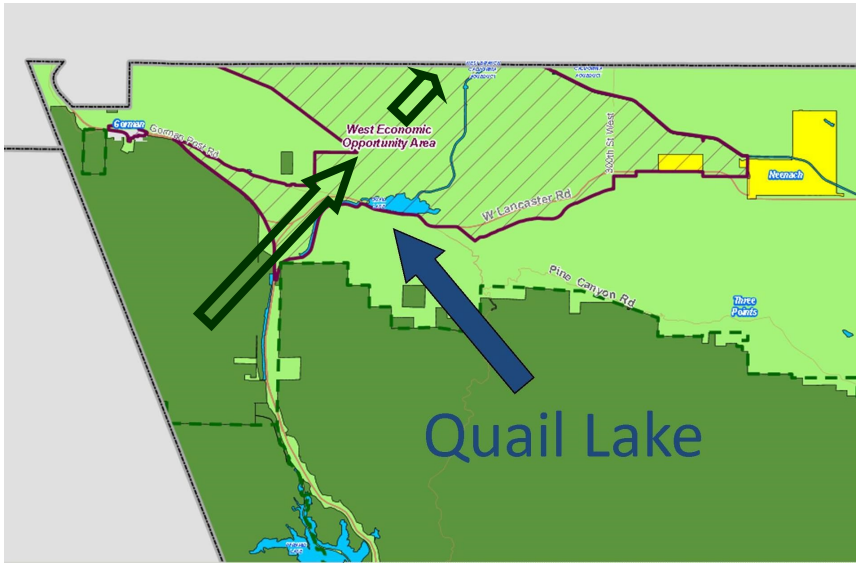
> *"This linkage has statewide importance as the sole wildland connection between the Sierra Nevada-Cascade system that stretches for over 2000 miles from Kern County into British Columbia, and the 800 mile long upland system comprised of the Sierra Madre (the coast ranges from San Francisco to Los Angeles), Transverse (Santa Monica, San Gabriel, San Bernardino, and San Jacintos Mountains), and Peninsular Ranges (Santa Ana, Palomar, and Laguna Mountains of San Diego County, and the Sierra Juarez of Baja). This linkage is also situated at the juncture of several ecoregions, including the Sierra Nevada, South Coast, Central Valley, and the Mojave Desert. The Tehachapis have been described as a "biogeographic crossroads" and a "crucible of evolution", and are home to a stunning variety of plant and animal life (White et al. 2003). As might be expected in this remarkable landscape, the Linkage Design encompasses a diversity of natural communities, including over 30 vegetation types." (Appendix G, page 607)*

A map on page 609 of Appendix G shows this crucial recommended wildlife linkage in the West Antelope Valley as recommended by the South Coast Missing Linkages Project (arrows added for clarity):



Green Arrow: wildlife linkage **Blue Arrow: Quail Lake** **Red Arrow: Hwy 138**

The recommended wildlife linkage skirts the eastern edge of Quail Lake and is crossed from east to west by Hwy 138. **In direct conflict to this recommended wildlife linkage, these lands are also included as part of the AVAP's West Economic Opportunity Area as shown in the map below.** Missing from the DEIR is an evaluation of the probable effects on this important linkage that will occur when the West Economic Opportunity Area is built out. Also missing from the DEIR is an analysis of the effects of enlargement of and increased traffic on Hwy 138 which crosses this "sole wildland connection between the Sierra Nevada-Cascade system." The EIR ignores this important conflict between proposed economic development areas and recommended crucial wildlife linkages to the Tehachapi Mountains, a linkage described (as previously quoted) as a **"biogeographic crossroads" and a "crucible of evolution."**



Map from AVAP showing West Economic Opportunity Area. Note that it includes the area recommended by the South Coast Missing Linkages Project as the "sole wildlands connection" between the mountains of Southern California and the Sierra Nevada-Cascade systems. Arrows added for clarity.

Green Arrow: Wildlands Linkage

Proposed new SEAs also cover this same important wildlife linkage. However due to the identification of the area as the West Economic Opportunity Area the obvious conflict has been commented on extensively by potential developers. **Tragically, in response to those comments, it now appears that even that modest protection for this crucial wildlife linkage will be withdrawn and the SEA boundaries redrawn to accommodate the proposed West E.O.P**. We strongly object to this change. If retained, the DEIR must be revised to comment on the probable effects of this change. Even if the change is rescinded, the EIR must address the effect that the West Economic Opportunity Area in its entirety will have on the Tehachapi Connection Wildlife Linkage.

Appendix A of the draft AVAP, "Conservation and Open Space Elements" also documents the importance of San Andreas SEA as originally proposed stating that:

> *The San Andreas SEA includes several important linkages for wildlife movement. The Fault Zone connects with the Santa Clara River drainage in the Lake Hughes area, linking with this large, free flowing watershed that extends to the Pacific Ocean in Ventura County. The foothills and grassland in the westernmost tip of the SEA are part of an important linkage between the San Gabriel Mountains and the Tehachapi Mountains. This linkage to the Tehachapi Mountains is important because it connects the southernmost extent of the Sierra Nevada Mountains with the San Gabriel Mountains and with the Southern Coast Ranges. The Tehachapi Mountains are the only mountain linkage between the Transverse Ranges and the Southern Coast Ranges to the Sierra Nevada Range. This largely natural area may be an important topographic reference for migrating birds and bats, as well as functioning for essential high elevation foraging grounds along their migration route. The Tehachapi Mountains further provide a valuable link for gene flow between divergent populations of many species, including plants. The SEA includes several large drainages that extend from the San Gabriel Mountains to the western end of the Mojave Desert: the Antelope Valley floor and the Fairmont and Antelope buttes. These washes provide an important linkage for animals traveling between the mountains (all the ranges mentioned above) and the Mojave Desert. In addition, Amargosa Creek facilitates east - west wildlife movement through Liebre Mountain, Portal Ridge, and Ritter Ridge to Barrel Springs in the Antelope Valley near the City of Palmdale. The frequency of valuable riparian communities along this travel route located within an otherwise arid climate, further indicates the importance of this area, which is one of the busiest natural wildlife linkages in the region.*

In addition, extensive documentation on the planning department website supports the biological importance of all SEA extensions as originally proposed. This extensive documentation is now evidently being ignored due to political pressure. This is not scientifically or morally justifiable.

SEA Ordinance

In addition, we question the validity of conclusions reached in this plan due to unanswered questions concerning revisions to the SEA ordinance still under review. The DEIR states that SEAs and Hillside Management Areas "...*represent a wide range of biotic communities. Their complex ecological relationships are the subject of both aesthetic enjoyment as well as scientific study. The proposed update to the Los Angeles County General Plan—outside the scope of the Proposed Project-is anticipated to include major revisions to the Sea Ordinance*." (Page 5.1-4) **It is impossible to accept that a valid EIR can be drafted before these "major revisions" are in place.**

Environmental Analysis: Aesthetics

We are pleased to see that this section of the DEIR recognizes the aesthetic value as a "scenic Resource" of protected wildlands such as the Antelope Valley Poppy Reserve. As stated on page 5.1-8, *"Within the valley's many large expanses of undeveloped land, long-range views of vacant desert and grassland can also be considered scenic vistas, since unobstructed views of natural landscapes are rare in southern California."* Unobstructed views are an important feature of the Poppy Reserve where visitors to the reserve are currently able to hike to observation points, elevated above the surround areas, and enjoy views to the Angeles Forest and Tehachapi Mountains that feature unobstructed "natural landscapes." **The Reserve is thus important both for visitors "looking in" at Reserve lands and visitors "looking out" on natural vistas from view points on the Reserve.** We would urge that the DEIR recognize **the importance of these existing unobstructed views** of the natural landscape that are currently available to the public and add language that states that maintenance of long-range views are most crucial in the viewshed of protected public spaces such as the Antelope Valley California Poppy Reserve and Saddleback Butte State Park.

Tourism Economy

Policy ED1.16 sets the goal that, concerning Economic Development, that development will "preserve the scenic resources of the Antelope Valley…in such a way that can contribute to the economic activity of the area." We would like to point out that the existing scenic resources such as the Poppy Reserve already contribute much to the economic activity of the Antelope Valley as a widely recognized source of visitor dollars through the tourism economy. This policy seems to imply a conflict between scenic resources and economic development when in fact just the opposite is true; existing scenic resources in the Antelope Valley that, as stated in the DEIR offer "unobstructed scenic views" and are "rare in southern California" are much valued by visitors. **Unobstructed views and visitors' enjoyment of them draw tourism dollars to the Antelope Valley and do not impede but in fact promote the economy.**

Nightime Views

Dark Skies also draw tourism dollars to the Antelope Valley. Saddleback Butte and the Antelope Valley California Poppy Reserve regularly make the list of top places in Los Angeles County to view the nighttime sky. Both are used regularly by astronomy groups who welcome the public to view the nighttime skies through their telescopes. These star gazers also contribute much to the tourism economy. Preservation of dark skies in those areas will not impede the economy but will in fact continue to contribute to it and will become even more important in the future as other areas of Los Angeles County continue to lose their dark sky resources.

Sincerely,

Margaret Rhyne

On Behalf of Friends of Antelope Valley Open Space

www.avopenspace.org