

From: Three Points-Liebre Mountain Town Council
Sent: Monday, October 06, 2014 4:41 PM
To: Emma Howard
Subject: SEAs and AVAP

Dear Emma,

Please see our attached letter concerning the AVAP DEIR. There are several paragraphs that pertain to the changing SEA boundaries I have pasted below, and would appreciate your consideration of our points as the plan and SEA boundaries continue their way through the public process.

Thank you,

Susan Zahnter

Our town council appreciates the opportunity to comment on the Antelope Valley Area Plan Draft Environmental Impact Review (AVAP, DEIR). We are concerned about several aspects of the newly revised AVAP. It speaks of a Rural Preservation Strategy, but throughout the Plan, goals and policies direct all residential, commercial, and industrial development to rural towns. Land use changes and zoning are special concerns, and insertion of Economic Opportunity Areas (EOAs) are targeted to areas that are completely, or mostly rural, and have limited or no such development at this point. In the rush to get this document to the Planning Commission, updated information and, especially, maps, were not available with time to review prior to the public hearing, leaving us with precious little time to respond. How can the DEIR adequately reflect and analyze an essentially unfinished

AVAP that changes in the days before the hearing and after the DEIR is released?

To begin, we would like to point out some obvious map references and exclusions in the DEIR. Figure 3-4a is a map we would like to confirm as more appropriate for rural preservation in the western Antelope Valley. It differs from other maps that reflect the requests of the Tejon Ranch, building, business, and real estate lobbies, in that it shows lower densities in the northwest county. Figure 3-6, proposed Significant Ecological Areas (SEA) should remain and not be gerrymandered by above referenced lobbies. Furthermore, Chapter 5, page 5.1-16, referenced Policy COS 13.1, which states, "Direct utility-scale renewable energy production facilities, such as solar facilities and wind facilities, to priority locations on the Renewable Energy Production Map (Zones 1 through 3) where environmental, noise, and visual impacts will be minimized." This map was retracted 9/08/2011, and focused renewable energy development within the viewshed of the State of California Poppy Reserve, and residents of Portal Ridge and Lakes areas. Finally, our town council letter is listed and available in Appendix B, pages 49-56/100, letter is listed and available in Appendix B, pages 49-56/100,

pages 49-56/100, but it is not analyzed with other letters in the Executive Summary, even though it was sent within the time frame required by the Notice of Preparation. We request that it be summarized and addressed along with other letters in the Executive Summary of the Final EIR (FEIR). We believe the information we presented is important for readers of the DEIR and subsequent FEIR, and are disturbed that our letter was left out of Table 1-2. Often, readers rely upon the Executive Summary for overview of the proposed project and to glean important points of interest for further review that are more deeply placed within the document.

Our discouragement and disappointment are surely felt as a result of the actions of the Regional Planning Commission's decision to excise the Tejon

Ranch's Centennial Project property from SEA 21 and change boundaries of several SEAs without producing an updated map for public review, or noticing parties via email in time to make public comments at the September 27th meeting. It has been our informed understanding that inclusion of areas is science-based, as evidenced by the biological studies listed on the county's own website, and statements of proven biological value presented throughout the DEIR. We support expansion of Significant Ecological Areas (SEAs) and continue to do so, and want to see the original proposed map remain as final in the Plan.

Since when do business and building development organizations decide SEA boundaries? Have they provided extensive biological review to prove the exclusion? Has Regional Planning proved the retraction will not harm sensitive environments, wildlife corridors, and USGS identified evolutionary biodiversity “hot spots”? This was in our NOP letter, but never specifically addressed in the DEIR. In the case of Tejon Ranch-Centennial Project, which is adjacent to Critical Condor Habitat, location of the convergence of the Transverse Ranges, the Tehachapi Mountains, and the Sierra Pelona Range; will the development irreparably harm these crucial wildlife and environmental resources? The DEIR states significant unavoidable impacts. This is not beyond at least partial mitigation. Reduce densities, preserve open-space and SEA 21, and eliminate the western Economic Opportunity Area (EOA), as would be indicated in the Alternative Land Use Map option—that needs more clarification. We continue to wonder how directing high-density residential, commercial, and industrial development to rural lands will protect these areas of biological importance.

Further evidence of the need to reevaluate the changes to SEA boundaries to exclude focused intensive development proposed in the western Antelope Valley (AV) is its designation by the Audubon Society as a Globally Important Bird Area. The DEIR does not adequately discuss the area's importance to birds and their Pacific Flyway migration route. We would like inclusion of discussion of impacts to migratory birds allowed by industrial development in rural areas crucial to their survival, like agricultural and open-space lands targeted by the County for renewable energy development (conversion of A-1 to A-2). The western AV is also home to Condors. We submitted a map of Condor GPS locations in our NOP letter, showing their visits to the proposed

Centennial Project and surrounding areas which contain increased residential densities and commercial and industrial development. No bird resource information was included in Appendix G. Additionally, wildlife corridors referenced in Appendix G cross the area where the Centennial land use map requests increased density within their EOA. Sprawl effects have not been evaluated, and may allow piecemeal development in this important natural area.

With regard to Centennial, the county's own Significant Ecological Area Technical Advisory Committee (SEATAC) recommended: "To insure preservation of the biological resources of the open space there needs to be a detailed management plan. Although it is typical to have such a plan approved by County without public input after the EIR has been approved, in this case the impact is so substantial that SEATAC thinks the detailed plan should be part of the EIR and subject to SEATAC review as well as to public comment. The permit on the EIR once granted, cannot be revoked, neither legally, nor in the de facto sense" (SEATAC Meeting Minutes, 9/8/2008, 13/47). There is no indication of final review of the AVAP Land Use Map by SEATAC, even though Community Standards District documents must be reviewed by them if community boundaries fall within SEAs. There was no public discussion of a habitat management plan as suggested when the Land Use Map was created and went through various iterations. Furthermore, the last visit to SEATAC was September 2008; subsequently, the Centennial Specific Plan was dropped, and then inserted into the AVAP Land Use Map. It appears to have skirted continued scrutiny by SEATAC and more stringent environmental review that would have detailed cumulative impacts and sought input from the public. As the Specific Plan stood on the last review, "SEATAC determined that the present design of the Centennial project is NOT COMPATIBLE with the principles of the Portal Ridge/Liebre Mountain SEA and NOT COMPATIBLE with the principles of the Tehachapi Foothills SEA." It was requested the project incorporate changes and further recommendations would be forthcoming from SEATAC.

This begs the question, why has Regional Planning allowed intensive land use, incompatible zoning, and an expansive EOA in the western AV that conflicts with the proposed AVAP policies that "emphasize the conservation of SEAs and open-space areas," and "the Proposed Project includes expanded SEA

boundaries and reduced densities” (DEIR, 7.4.4). Additionally, Policy LU 2.1 indicates, “Limit the amount of potential development in Significant Ecological Areas, including Joshua Tree Woodlands, wildlife corridors, and other sensitive habitat areas, through appropriate land use designations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan” (5.4-73). Not only that, but the DEIR explains, “The proposed SEAs provide linkages and corridors to promote regional species movement within the Project Area; these linkages are critical for conserving habitat and biodiversity, and in some cases these SEAs overlap with Regional Wildlife Linkages,” and “ the updated SEA boundaries are based on the latest biological information and GIS mapping data, they are considered biologically superior to the smaller SEA boundaries designated in the Adopted Area Plan” (5.4-68; 7.4.4).