

From: [Karen](#)
To: [Tahirah Farris](#)
Subject: Re: Leona Valley CSD
Date: Thursday, December 3, 2020 12:41:42 PM

CAUTION: External Email. Proceed Responsibly.

Hi Tahira,

Yes, I think that wording removes the ambiguity from the fencing section. Thank you!

Now for my 3rd, and hopefully final, concern. This is the one that is likely to get the community to revolt. You are new, so haven't seen our residents in action when they don't like something being forced on them. Again, historically, we have been a small ranching/agricultural community with very slow growth. We like it that way. What we don't like, or want, is tract developments or high density housing. For the last dozen or so years we have made that very clear to the county. Unfortunately, the staff turnover at the county level is high so each new generation doesn't have a good grasp of what went before, or even who we are or what we want. On the other hand, we have more than a decade's worth of material (which we can produce) that we have consistently worked on and have clearly stated what we want. And that hasn't changed. While you and your team only started on this project in March of 2018 (as stated in your Concept Draft document) we have been working on this, in an unwavering manner, for almost 15-years. Also, as stated in your Concept Draft, we do want to protect our native habits and vegetation *but* we also want to allow an individual property owner to build their single family home and use their property in our historically consistent ranching/agricultural developmental manner.

That brings me to my concern over Paragraph G. - this paragraph is made to look like it is part of the Maximum Signage Area section. This paragraph has many residents confused due to the fact the 22.102.040 Exemptions for single family homes are clearly listed at the beginning of the document, therefore meaning they are exempt. Their interpretation - not mine. Paragraph G. was NOT in any prior draft and only appeared for the first time in this current draft document. I personally would like to know when this paragraph G. was added to the draft and what particular communications with the Leona Valley committee led you to believe that it was what the community wanted. The fact that Paragraph G. only excludes section A. of the 22.102.040 Exemptions (single family residences and agricultural uses) is the complete antithesis of what the community has been asking for all these years. By not allowing single family residences to be exempted the county is essentially putting a No Growth policy on our community. The average Leona Valley property owner will not be able to afford all the new additional fees that come from excluding single family residences in the 22.102.040 A. exemptions. Additionally, the fact that all the other 22.102.040 Exemptions, B. through P., are still allowed makes no sense. Because paragraph G, coupled with the opening Section 22.102.040 Exemptions in this draft, has so many residents confused I would recommend postponing the hearing until you can get a true sense of what the community really wants. In talking with a number of the residents I can assure you the community doesn't want Paragraph G. This is a really big deal with really big impacts so it needs to be done right!

Once again, thank you for your consideration.

Karen Bryan

On Wed, Dec 2, 2020 at 5:56 PM Tahirah Farris <TFarris@planning.lacounty.gov> wrote:

Hi Karen,

I'm glad we could accommodate the community's request to prohibit drive through facilities.

Regarding the fencing, I just discussed this with our team again and we did think the community wanted to ensure that fencing for the protection of animals would be permitted. However, I understand the concern that someone could use that reasoning to install a type of fencing that is not desired by the community. We have proposed another minor change to the language to resolve that concern.

"B. Fencing. Where perimeter fencing is installed, **including** where installed to protect horses and livestock, it shall be of an open, non-view-obscuring, permeable type design such as wood rail, steel pipe, vinyl rail, PVC pipe, recycled plastic rail, or coated wire. Except for retaining walls, solid, view-obscuring perimeter fences or walls shall be prohibited.

Does this achieve your goals? Please confirm.

Thank you!

Tahirah

From: Karen [mailto:karen@hdecj.com]
Sent: Wednesday, December 2, 2020 4:16 PM
To: Tahirah Farris <TFarris@planning.lacounty.gov>
Subject: Re: Leona Valley CSD

CAUTION: External Email. Proceed Responsibly.

Hi Tahirah,

I am super glad to see that Drive Through facilities are now prohibited. Thank you for that!

However, I still have a problem with the Fencing language. As I said yesterday, I think "except where installed to

protect horses and livestock" is too ambiguous. For example: I buy a property. I decide to raise rare expensive mini pigs. Therefore, I am going to put up a solid block wall around the perimeter of my property to keep the pigs in and to keep the coyotes out. I will be "protecting" them so a block wall (or other impermeable fence) will fall under the "except where" language. Even a novice lawyer could twist this language for anyone wanting to install a block wall (or some other form of solid fence) and use animal protection as the reason. The community's goal was to specifically ban solid, view obscuring fences and walls. I don't think your language accomplishes that based on my example.

Thank you for considering my concerns.

Karen Bryan

On Wed, Dec 2, 2020 at 3:57 PM Tahirah Farris <TFarris@planning.lacounty.gov> wrote:

Hi Karen,

I'm so sorry, the previous "clean" version I sent you still had the old fencing language. Please see attached for the updated "clean" version.

Tahirah

From: Tahirah Farris
Sent: Wednesday, December 2, 2020 1:08 PM
To: Karen <karen@hdeci.com>
Subject: Leona Valley CSD

Good afternoon Karen,

I'm providing a revised draft based on changes I mentioned in my email yesterday and am also attaching a clean version so you can see the exact language without the underlining and strikethroughs.

Please let me know if you have any questions or would like to discuss.

Tahirah

Tahirah Farris, AICP

Regional Planner

Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor | Los Angeles, CA 90012
Email tfarris@planning.lacounty.gov

<http://planning.lacounty.gov>

Please note: In response to the evolving coronavirus emergency, Los Angeles County facilities are currently closed to the public. All Department of Regional Planning staff are teleworking at this time and available by email. For the most current information about available services, public meeting schedules, and planning projects, please visit planning.lacounty.gov.

--

Karen

--

Karen

From: [Karen](#)
To: [Tahirah Farris](#)
Cc: [DRP AV Community Standards Districts](#); [Mark Herwick](#)
Subject: Re: Leona Valley Community Standards District Update
Date: Tuesday, December 1, 2020 12:05:23 PM

CAUTION: External Email. Proceed Responsibly.

Hi Tahirah,

Thank you for responding to my comments on the draft CSD for Leona Valley. I am someone who has worked on this plan for over a decade, through all of its various iterations, so I feel I have a very good grasp of what the community wants. As you are aware, because of our location and the size of our lots, we are naturally a very slow growth area. I believe we average one new home every two years within our CSD. Our community is fine with that growth rate. What they don't want is the encroachment of Palmdale and the tract housing developments that come with that.

To further expand on the numbered points in your email:

1. I believe most of our residents that have read the draft CSD believe that the first part of the draft that references the SEA Exemptions is listing them in a manner that is stating that single family residences are being exempted. They definitely are not reading it in the manner you are suggesting that you are merely adding the underlined first sentence of A. Many believe you have added this SEA section to the beginning of the draft as an assurance that single family homes are exempt. They also don't understand that because the county has added a new paragraph G., specifically excluding the components of 22.102.040 A, it is now categorically excluding the exemptions of building a single family residence - while leaving all of the other exemptions in place. Many can't even find Section G because you have it pushed up into the Maximum Sign Area paragraph. I personally have to question whether the obfuscation of this component is deliberate. I believe the county is well aware of the desires of the community to be allowed to build single family homes.

2. My concern with the Drive Through language is that I see a legal loophole. Scenic Drives are generated by the state. We don't have any Scenic Drives in our community. What the county is talking about here are simply lines drawn on a map (4.2) in the AV Area plan (I think we drew those) however, they are not recognized by any official entity. In fact the wording of the AV Area Plan indicates they are on a "wish list" of sorts. How can this possibly be enforced? Where is the "program" that the county talks about developing and implementing in that chapter? This is all too vague and ambiguous. Until a Scenic Drives program has been developed and adopted by the county I don't see this as being enforceable.

E. Antelope Valley Scenic Drives Program

This Area Plan has identified a number of Scenic Drives in the Antelope Valley (Map 4.2) that **should** be preserved to ensure that their scenic value is maintained in the years to come. Thus, it is the **intent** of this Area Plan **to develop and implement a program** for future review of proposed developments within viewsheds of these Scenic Drives, which **may** include:

- Required Visual Impact Assessment for proposed development within the viewsheds of identified Scenic Drives;
- Required finding for discretionary entitlements that the proposed development is compatible with the scenic character

of the route; or
· Applicable development standards for development along a Scenic Drive.

3. The SEA language for fencing makes it impossible for anyone in that zone to ever have livestock - regardless of size - contained by a perimeter fence. Horses can jump the height limit of 42", small animals sheep, goats, chickens, dogs, can simply crawl under the 18" bottom rail limit. This is especially true on the smaller properties that use their perimeter fencing as their animal boundary. We are, after all, a farming and livestock rearing community! I get the free movement of wildlife concern but with our current growth rate I don't see that being an issue for at least another 30 years or more. We have so much open space and judging by the wild animal trails, which are clearly visible, the wild animals have no difficulty finding their way around the existing impermeable fences. The wild animals are actually quite intelligent. That said, I do prefer your suggested wording of "where installed" over where necessary but that still becomes an ambiguous statement. I believe the county's added wording of: **with the bottom edge of the fence no lower than 18 inches from the ground to allow for unrestricted movement of wildlife** needs to be removed too. The goal wasn't to make the non-SEA properties compliant with the SEA fencing restrictions. The goal was to make it so the SEA properties could have/raise livestock in a safe manner. My suggestion for wording would be something similar to:

B. Fencing. Where perimeter fencing is installed it shall be of an open, non-view-obscuring permeable type design such as wood rail, steel pipe, vinyl rail, PVC pipe, recycled plastic rail, or coated wirewire. Except for retaining walls, solid, view-obscuring, impermeable perimeter fences or walls shall be prohibited.
1. 22.102.090 - SEA Development Standards., D. Other Development Standards, b. and c., listed ground and height requirements do not apply to this CSD.

I have personally talked to community members that want to form a group to protest this CSD. I believe that if the issues that I have raised and the concerns the Town Council have addressed that that can be avoided. Most importantly, they community needs to see a clean document that is easy to read without all the redlining.

Finally, in conjunction with the Town Councils comments and request, I would ask for an extension to clarify all the issues raised.

Thank you,

Karen Bryan

On Mon, Nov 30, 2020 at 2:47 PM Tahirah Farris <TFarris@planning.lacounty.gov> wrote:

Good afternoon Karen,

Thank you for your comments and all your work on the CSD to date. I want to make sure your concerns are addressed and you feel comfortable that the draft represents of the community's

desires. In addition to my responses below, Mark and I are available for a phone call to talk through your concerns further so you are comfortable with how they are being addressed.

1. The amendment to the SEA ordinance includes underlined language that is added to existing language. Everything stated in A 1-3 is existing language in the SEA ordinance. However, the new language identified by the underlining is the beginning of the sentence under A, where it states "Except as otherwise specified in a Community Standards District (CSD)..." This is what ensures that anything written in the CSD regarding the matter will take precedent.
2. We have discussed our approach with drive-through services with Peggy Fuller and I'm happy to discuss further with you as well. We are prohibiting drive-throughs them on parcels adjacent to Scenic Drives as identified in the AV Area Plan. I believe you are referring to Acton where drive-throughs are currently banned community-wide. That specific issue was done as a Board directive and was not part of a CSD update. We don't have a similar motion for other communities, but we are using the land use tools and policies available to us to be able to address the concerns and achieve the desired outcome. There are just a handful of parcels in Leona Valley that have zoning where it might be appropriate to establish a drive-through. However, our approach to prohibit them adjacent to Scenic Drives means those parcels are no longer available for drive-through services. This approach supports the goals of the AV Plan to be able to protect environmental and aesthetic resources in the community by referencing the mapped resources.
3. Some of the fencing language is existing in the CSD and we tried to clarify and also add consistency with the SEA ordinance for those areas in the community that do not fall within the SEA. That is where the "18 inches from the bottom" comes from. It will create consistency throughout the community since it is the community's desire to impose the SEA ordinance. Instead of using the term "where necessary" for the protection of horses and livestock, we could change it to say "where installed" if that would address the concern with that issue. Also, the reference to split-rail is an example of one type of open fencing, but others could be used. It is not exclusive. That is language existing in the CSD as well.

I do hope these comments help to show where the language achieves your goals. Please let me know if you'd like to have a phone call, and if so please provide the best number and times we can reach you.

Thank you,

Tahirah

Tahirah Farris, AICP

Regional Planner

Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor | Los Angeles, CA 90012
Email tfarris@planning.lacounty.gov

<http://planning.lacounty.gov>

Please note: In response to the evolving coronavirus emergency, Los Angeles County facilities are currently closed to the public. All Department of Regional Planning staff are teleworking at this time and available by email. For the most current information about available services, public meeting schedules, and planning projects, please visit planning.lacounty.gov.

From: Karen [mailto:karen@hdec.com]
Sent: Friday, November 27, 2020 9:20 AM
To: Tahirah Farris <TFarris@planning.lacounty.gov>
Subject: Re: Leona Valley Community Standards District Update

CAUTION: External Email. Proceed Responsibly.

Hello Tahirah,

I have submitted the following comments to the Leona Valley CSD.

Thank you for the opportunity to comment. While I have been a participant in assembling this draft CSD document I still have a few concerns on items that I don't feel are clear or that have the potential to be confusing to residents.

1. The draft starts with SECTION 1: Chapter 22.102 (Significant Ecological Areas). It states it is hereby amended to read as follows: **22.102.040 Exemptions.** and specifically lists A -1,2,3 as being exempt. These are the exemptions the community is allowing under title 22.102 Significant Ecological Areas document.

However, further down in the CSD document under a stand alone section “G” it states: **G. Significant Ecological Areas. Exemptions listed in Section 22.102.040. A, do not apply to this CSD. 22.102.040 A** are the exact (and only) exemptions listed in the opening paragraph as being allowed by our community. These two items are in direct conflict so which is it? As you are well aware, the community wants to keep out tract style developments but still allow single family homes to be built.

2. 22.330.060 Community-wide Development Standards. A. Drive-Through Services. The CSD committee has repeatedly asked for this to not be allowed in our community. You have allowed other communities to exclude “Drive through” establishments in their CSDs and we are requesting the same language to be allowed in our CSD

3. B. Fencing - I believe this section is grossly inadequate and poorly worded. Who defines “where necessary”? Many forms of livestock (chickens, goats, sheep) cannot be contained in a pasture with fencing 18” from the ground. Many of the split rail type fences you are requiring soon have a second layer of impermeable wire mesh applied to the back of them - meeting your fence requirement for non view obscuring - but defeating your wildlife movement goal. Nor is vertical wrought iron fencing, which is permeable and generally goes to the ground, addressed. This is often used on the front or street facing perimeter of a property. As all of us that live here know, wildlife has no problem moving around in our community. We still have an abundance of undeveloped open properties in Leona Valley. The goal of the community is met with the last sentence of Item B: Except for retaining walls, solid, view-obscuring perimeter fences or walls shall be prohibited.

I don’t believe the current draft CSD document is complete and a rush to get it pushed through in it’s current state is a dis-service to the community. The community knows all too well how hard it is to live with a document that contains items that are poorly worded or items that are added that they don’t want.

Sincerely,

Karen Bryan

On Thu, Nov 19, 2020 at 6:08 PM Tahirah Farris <TFarris@planning.lacounty.gov> wrote:

Good evening,

Thank you to everyone who joined us for the online meeting to review the Leona Valley draft Community Standards District language on November 18th. I appreciate everyone’s time and discussion during the meeting.

Please find a link to the revised draft CSD encompassing changes discussed during the meeting that were requested by the Leona Valley Town Council. In addition a link to the recording of the meeting is provided. Feel free to share this with any residents who may be interested.

Revised CSD Draft dated November 19, 2020:

<https://planning.lacounty.gov/site/avcsd/wp-content/uploads/2020/11/Leona-Valley-CSD-Public-Draft-11.19.2020.pdf>

Link to the recorded November 18th online meeting:

https://planning.lacounty.gov/site/avcsd/wp-content/uploads/2020/11/GMT20201119-020020_Leona-Vall_1680x768.mp4

Please reach out with any questions or comments you might have.

Best,

Tahirah

Tahirah Farris, AICP

Regional Planner

Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor | Los Angeles, CA 90012
Email tfarris@planning.lacounty.gov

<http://planning.lacounty.gov>

Please note: In response to the evolving coronavirus emergency, Los Angeles County facilities are currently closed to the public. All Department of Regional Planning staff are teleworking at this time and available by email. For the most current information about available services, public meeting schedules, and planning projects, please visit planning.lacounty.gov.

| Karen

--

Karen