



# Los Angeles County Department of Regional Planning

*Planning for the Challenges Ahead*



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## **SUPPLEMENTAL REPORT TO THE REGIONAL PLANNING COMMISSION**

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DATE ISSUED:	April 22, 2021	
MEETING DATE:	April 28, 2021	AGENDA 5 ITEM:
PROJECT NUMBER:	2019-003989-(5)	
PROJECT NAME:	Three Points-Liebre Mountain Community Standards District	
PLAN NUMBER(S):	Advance Planning Case No. RPPL2018002324	
SUPERVISORIAL DISTRICT:	5	
PROJECT LOCATION:	Three Points-Liebre Mountain	
PROJECT PLANNER:	Kristina Kulczycki, Principal Regional Planner kkulczycki@planning.lacounty.gov	

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Please find the enclosed letter of support from the Three Points-Liebre Mountain Town Council for the above referenced item received subsequent to the hearing package submittal to the Regional Planning Commission.

Report  
Reviewed By:

Mark S. Herwick, Supervising Regional Planner

Report  
Approved By:

Bianca Siegl, Deputy Director



*Three Points-Liebre Mountain Town Council*

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20 April 2021

SENT VIA EMAIL

Los Angeles County Regional Planning Commission  
320 West Temple St.  
Los Angeles, CA 90012

Honorable Commissioners,

RE: Agenda Item 5, Proponent, April 28, 2021 Planning Commission Meeting; Project No. 2019-003989-(5); Advance Planning Case No. RPPL2018002324; Three Points-Liebre Mountain, Antelope Valley Planning Area

Three Points-Liebre Mountain Town Council's area consists of a closely knit community that inspires neighborliness, and at the same time, respect for privacy, and a desire for self-reliance and self-sufficiency. Our council is located at the juncture of Three Points Road/ Northwest Highway 138, running to Old Ridge Route Road/Highway 138 to the west, directly adjoining the Angeles National Forest (ANF) Boundary on the south for approximately ten miles traveling eastward. Our community values its "doorstep" location in direct proximity to the Angeles National Forest. Residents and visitors alike enjoy spectacular views of the San Gabriel Range's Liebre Mountain, the Tehachapi Mountains and their convergence with the Transverse Ranges, as well as outstanding and impressive views of the Antelope Valley floor, all of which provide an amazing backdrop of natural beauty and ecological value to our community, and to Los Angeles County. Part of our mission is to maintain our rural atmosphere, and protect our environment to the greatest extent possible, and we believe the Community Standards District (CSD) Ordinance prepared by Regional Planning will contribute greatly to our efforts and satisfy our responsibilities as a council.

The Antelope Valley Area Plan (AVAP) describes Three Points as a "Rural Preserve Area" with no town center, largely undeveloped and lacking infrastructure for serving a larger population and/or public facilities, and unsuited to commercial or industrial development that would require increased infrastructure improvements that would change community character assured by the plan. The AVAP recommends "[r]esidents of rural preserve areas should be prepared to forego additional infrastructure in order to live in a *very remote rural environment* (emphasis ours) and enjoy the benefits offered by such an environment" (Chapter 1, I-8). The council area's rural preserve designation finds support in aspects of our CSD that promote low density. Moreover, a large majority of the town council's territory occupies the San Andreas Significant Ecological

Area (SEA), its eponymous fault zone, Hillside Management Areas, and inclusion in a Very High Fire Hazard Severity Zone. All of these “Special Management Areas” possess exceptional and quite notable environmental resources, and commensurately, contain exceptional scenic resources along county identified scenic highways that are deeply valued by our residents, and worthy of low density and building design aspects to support the integrity of scenic values within the San Andreas SEA and its environs (Los Angeles County Town and Country Scenic Drives Map 4.2).

Our town council area also includes a portion of the historic Ridge Route Road, built in 1915, one of the few highways to make the National Register of Historic Places (September 25, 1997). The portion spans the roadway from State Route 138, south to Pine Canyon Road, and from there it enters the Angeles National Forest. Pine Canyon Road continues eastward through notable stands of oak and pine forests and views of Liebre Mountain (an ANF Special Interest Area), to Three Points Road with its views of the Tehachapi Mountains, and Portal Ridge. Pine Canyon Road follows the San Andreas Fault Zone eastward, traveling through varied riparian, forest, and grassland habitats associated with the SEA, designated by the Angeles National Forest Land Management Plan as a high-value scenic area, and served also by the Pacific Crest National Scenic Trail, which passes through our community (Part 2, 57-59).

Attention must be directed to the potential effects of inappropriate development in our “very remote rural environment” directly adjacent to our community at Ridge Route Road and State Route 138—Tejon Ranch’s Centennial Project. Despite claims that the project development would not encourage sprawl-type growth in this “remote” area, the purpose for the proposed Northwest SR 138 Highway expansion *is* the planned development. In fact, CalTrans’ own Natural Environment Study, March 2016 reveals, “[t]he widening of SR 138 is expected to create growth inducement that will increase human disturbance associated with all terrain or off-highway vehicle use, littering, vagrancy, pollution, and introduction of pet species. New residential and commercial construction in the area is also expected to occur which will contribute to the edge effect of adjacent habitat” (Ch. 4.6.6, p. 116). With the recognition of our area situated immediately adjacent to such planned high density, high intensity development, SR 138 expansion, and its location within the San Andreas SEA, we support waiving the Antelope Valley exemption, and look forward to our CSD functioning to address expected growth within SEA and Hillside Management areas via large minimum lot sizes; management and preservation of native vegetation, biological diversity, wildlife movement; and scenic corridors.

With respect to those Special Management Areas that encompass our community and identify hazards like earthquake, flood, fire hazard risks, and which address those hazards through policy and ordinance, we return our attention to the previously mentioned Centennial Project and subsequent development in our adjacent area. If and when the project completes any of its building phases (first phase—five thousand homes), our community will, without our desire or intent, become an area of “Wildland Urban Interface.” Wildfire is a constant threat for us already, and as reported by CAL FIRE “95% of wildfires in California are human-caused” (CAL FIRE News Release, August 31, 2018). With the prospect of high-density development vastly increasing population nearby, increasing forest recreational use, and increasing fire risk, our

desire for very low density housing and limited commercial prospects for our town council's Rural Preserve Area is well justified, and will hopefully reduce environmental edge effects and threat to our residents from wildfire. We anticipate that future low-density housing might reduce wildfire risk of structure loss and injury, from not only smaller numbers of homes, but because homes would be quite distanced apart, there is less chance of rapid fire spread from house to house, as has occurred in suburban development patterns in Wildland Urban Interface areas across California.

With a view toward the future, our town council believes the Three Points-Liebre Mountain CSD provides a proactive approach in furthering our mission to protect and sustain our remote rural environment and lifestyle. As has happened many times, a biologically important environment is altered before any action is taken for its preservation. Any newly proposed development will be filtered through our CSD and guided with thought and respect for the amazing array of special features that surround us. Implementation of our CSD will benefit not only our residents, but the entire county as well. The SEA Program "Guiding Principles Statement, in part, recognizes the importance of biodiversity: "that it is necessary to maintaining a sustainable Los Angeles County," and "[ensures] the continuation of natural ecosystem services that improve quality of life for all who live in Los Angeles County" (SEA Implementation Guide, 4).

We are grateful to live in such an area as Three Points and appreciate its natural beauty, value its wildlife, and value its exceptional visual qualities. We truly appreciate the opportunity to comment on the Three Points-Liebre Mountain Town Council Community Standards District Ordinance that is proposed for our community. We find it is congruous with our rural lifestyle and small community values. Our council offers its support of the document and also extends thanks to Regional Planning for its work in bringing our ordinance to fruition.

Sincerely,



Susan Zahnter  
President



Richard Zahnter  
Vice President