October 2014 | Final Environmental Impact Report

ANTELOPE VALLEY AREA PLAN

County of Los Angeles

Prepared for:

County of Los Angeles
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PLACEWORKS

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1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Administrative Code Section 15000 et seq.).

According to CEQA Guidelines, Section 15132, the FEIR shall consist of:

(a) The Draft Environmental Impact Report (DEIR) or a revision of the Draft;

(b) Comments and recommendations received on the DEIR either verbatim or in summary;

(c) A list of persons, organizations, and public agencies comments on the DEIR;

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and

(e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DEIR for the Antelope Valley Area Plan during the public review period, which began August 22, 2014, and closed October 6, 2014. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DEIR comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.

1.2 FORMAT OF THE FEIR

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and content of this FEIR.

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the DEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number: A-1 through A-10 for letters received from agencies and organizations, and R-1 through R-2 for letters received from residents and businesses. Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

Section 3. Revisions to the Draft EIR. This section contains revisions to the DEIR text and figures as a result of the comments received by agencies and interested persons as described in Section 2, and/or errors and omissions discovered subsequent to release of the DEIR for public review.

The responses to comments contain material and revisions that will be added to the text of the FEIR. County of Los Angeles (County) staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the DEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the DEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of DEIRs should be "on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. …CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

CEQA Guidelines Section 15204 (c) further advises, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Section 15204 (d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204 (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency (County of Los Angeles) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses.

This section provides all written responses received on the DEIR and the responses to each comment prepared by the County of Los Angeles (County). Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the public review period.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Agencies & Organizations			
A1	Public Utilities Commission	September 30, 2014	2-3
A2	Endangered Habitats League (Letter 1)	September 27, 2014	2-7
A3	Endangered Habitats League (Letter 2)	September 27, 2014	2-15
A4	Center for Biological Diversity	October 3, 2014	2-35
A5	Tri-County Watchdogs	October 5,2014	2-53
A6	Friends of Antelope Valley Open Space	October 6, 2014	2-69
A7	California Department of Fish and Wildlife	October 6, 2014	2-75
A8	Three Points-Liebre Mountain Town Council	October 6, 2014	2-87
A9	Metropolitan Water District of Southern California	October 6, 2014	2-101
A10	Governor's Office of Planning and Research	October 7, 2014	2-127
Residents& Businesses			
R1	Granite Construction Company	September 23, 2014	2-131
R2	Eric Roy Anderson	October 7, 2014	2-137

2. Response to Comments

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LETTER A1– Public Utilities Commission (1 page)

STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
(213) 576-7083

September 30, 2014

Carl Nadela
County of Los Angeles
320 West Temple Street
Los Angeles, California 90012

Dear Mr. Nadela:

SCH 2014061043 Los Angeles County Antelope Valley Areawide General Plan Update - DEIR

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Branch (RCEB) is in receipt of the draft *Environmental Impact Report (DEIR)* for the proposed County of Los Angeles (County) Antelope Valley Areawide General Plan Update project.

The project area includes the active rail tracks. RCEB recommends that the County add language to the General Plan so that any future development adjacent to or near the planned railroad right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at any planned at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes, and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad ROW. A1-1

If you have any questions in this matter, please contact me at (213) 576-7076, ykc@cpuc.ca.gov.

Sincerely,

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings Engineering Branch
Safety and Enforcement Division

C: State Clearinghouse

2. Response to Comments

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A1. Response to comments from Ken Chiang, P.E., Public Utilities Commission, dated September 30, 2014.

A1-1 Please note that there are several proposed policies in both the Proposed General Plan Update and the Antelope Valley Area Plan (AVAP) that relate to rail safety, including the following:

- **Policy M 5.3**: Maintain transportation right-of-way corridors for future transportation uses, including bikeways, or new passenger rail or bus services. (County General Plan)
- **Policy M 6.6**: Preserve property for planned roadway and railroad rights-of-way, marine and air terminals, and other needed transportation facilities. (County General Plan)
- **Policy M 6.8**: In planning for all regional transportation systems, consider and mitigate potential impacts to existing communities, and minimize land use conflicts. (AVAP)

However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

2. Response to Comments

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LETTER A2– Endangered Habitats League, Letter 1 (5 pages)

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

EHL

September 27, 2014

VIA ELECTRONIC MAIL

Carl Nadela, AICP
Regional Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012
Email: tnc@planning.lacounty.gov

RE: July 23, 2014 Updates to Antelope Valley Area Plan (AVAP)

Dear Mr. Nadela:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these revisions to the AVAP and the new Chapter 8, Plan Implementation.

Land Use Element

The revisions to the Land Use Element add major Economic Opportunity Areas (EOAs) that are acknowledged to the result of growth-inducing new highways—the High Desert Corridor and the Northwest 138 Corridor Improvement Project. These EOAs are in addition to *previously* intensified housing and employment locations within Towns and Town Centers—which were intended to be balanced by Rural Preserves. With an aggressive new Economic Development Element that seeks to boost high tech and other jobs, the dye could be cast for major urbanization within currently rural areas.

If the General Plan's rural, agricultural, biological, and open space preservation policies are going to withstand this new direction, then it is essential that growth be highly focused and that there be active policies and programs to achieve open space goals and to implement the Rural Preserve strategy. Otherwise, the outcome will be the continuous sprawl that characterizes neighboring counties and the resultant loss of community separation and greenbelts.

How can a balance be achieved? Previous comments have noted the need for growth control policies between the West and Central EOAs, the role of very low densities in rural designations, the need to expand the SEAs, the use of planning tools to achieve conservation oriented site design, and other factors. Our current comments will address these and other facets of the solution.

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2. Response to Comments

Densities

EHL strongly objects to the removal of the RL40 category. Such removal is contrary to oft-stated goals in the plan for open space and biological preservation and fire safety. As we have pointed out in previous correspondence, a scientific literature review shows that adverse edge effects upon biological resources become pronounced beginning at a density of 1:40 then become progressively worse. Why is the Antelope Valley different from the rest of the County, in which RL40 is retained? Outside of EOAs, the default designation for SEAs, other biologically valuable lands, and High Fire Hazard Severity Zones, should be RL40, absent a predominance of existing smaller parcelization. This is a feasible mitigation measure to reduce biological impacts. A2-1

Lot sizes

LU 1.34: Maintain the majority of the unincorporated Antelope Valley as Rural Land, allowing for agriculture, equestrian and animal-keeping uses, and single-family homes on large lots.

Policy LU 1.34 perpetuates land-consumptive, inefficient, low density, highly impactful, automobile dependent low density suburbia. It destroys biological resources and scenic open space, is difficult to defend during wildfires, maximizes GHG emissions, and costs the taxpayer for infrastructure and services. A2-2

Rather, in Rural designations outside of EOAs, the County should allow ½-acre minimum lot sizes "by right," as in vast areas of rural Riverside County,[1] so as to permit consolidation of development along with permanent open space and increased fire safety. The amount of vegetation clearance to produce defensible space around dispersed estate lots is staggering. Smaller lots should not depend upon the Planned Unit Development layer of permitting. Absent flexibility for lot sizes, SEAs implementation will be thwarted. Rural Preserves will become low density suburbs, and landowners will have

[1] See Riverside County Land Use Element <http://planning.rctlma.org/Portals/0/genplan/general_plan_2013/1%20General%20Plan/Chapter%203-Land%20Use%20Element%20Adopted-Final%20Clean.pdf>, Table LU 4 on page LU-47: "Clustering is encouraged in all residential designations. The allowable density of a particular land use designation may be clustered in one portion of the site in smaller lots, as long as the ratio of dwelling units/area remains within the allowable density range associated with the designation. The rest of the site would then be preserved as open space or a use compatible with open space (e.g., agriculture, pasture or wildlife habitat). *Within the Rural Foundation Component and Rural Designation of the Open Space Foundation Component, the allowable density may be clustered as long as no lot is smaller than 1/2 acre. This 1/2 acre minimum lot size also applies to the Rural Community Development Foundation Component.* However, for sites adjacent to Community Development Foundation Component areas, 10,000 square foot minimum lots are allowed. The clustered areas would be a mix of 10,000 and 1/2 acre lots. In such cases, larger lots or open space would be required near the project boundary with Rural Community and Rural Foundation Component areas." (Emphasis added.)

difficulty obtaining planned unit yield. An essential accompaniment for relatively smaller lots are rural design guidelines. Please note that the "pie-shaped" lots anticipated by COS 19.3 are not always feasible and are insufficient as a stand-alone to achieve SEA and other goals. A2-2 cont'd

Site design

COS 4.4 Require new development in Significant Ecological Areas, to consider the following in design of the project, to the greatest extent feasible: . . .

EHL strongly supports Policy COS 4.4 regarding project design in SEAs, but these same principles should also apply to other natural or agricultural open space. A2-3

Implementation

COS 19.4 Pursue innovative strategies for open space acquisition and preservation through the land development process, such as Transfers of Development Rights, Land Banking, and Mitigation Banking, provided that such strategies preserve rural character.

While we support Policy COS 19.4 for a transfer of development rights program, it must be fast-tracked and given far more substance. TDR is an essential mitigation measure for the major economic and urban development now contemplated in the relatively remote and infrastructure poor Antelope Valley. It is vital to save Rural Preserves open space and to successfully implement SEAs. To be effective it must be built into this AVAP, and not be an afterthought in future, uncertain action items. If not built in now, opportunities to planned link density increases with open space preservation will be irretrievably lost, as the equity created and bestowed by up-planning would be given away. We would support a policy that credits protected on-site or off-site open space that has long-term biological value against TDR requirements. A2-4

Economic Development Element

We note the major new economic growth contemplated by the plan:

With the availability of land, easy access to transportation corridors and proximity to renewable energy resources, the Antelope Valley is a prime destination for high-tech manufacturing to relocate to as they are more and more crowded out of their current urban locations. One of the main drivers of economic development in the Antelope Valley will be the relocation of high-tech industries to appropriate locations in the unincorporated Antelope Valley A2-5

- *Policy ED 1.1: Promote the continued development of regional commercial and industrial employment centers in appropriate areas in the Antelope Valley, including the Fox Field Industrial Corridor.*

2. Response to Comments

- *Policy ED 1.2: Allow the development of commercial and industrial uses at the Palmdale Regional Airport site, provided that those uses are compatible with airport operations and do not restrict or prohibit future expansion of the airport.*
- *Policy ED 1.3: Support the growth of "high-tech" industries to employ the Antelope Valley population's highly educated workforce*
- *Policy ED 1.4: Support the development of the High Desert Corridor and the Northwest 138 Corridor Improvement projects to improve the east-west movement of goods, particularly between the Antelope Valley and the industrial areas of Kern and San Bernardino counties and beyond.*
- *Policy ED 1.5: Promote the development of an "Inland Port" in the Antelope Valley, providing additional employment in the trade and logistics sectors.* A2-5 cont'd
- *Policy ED 1.6: Support the development of a range of travel options that better connect the Antelope Valley to existing regional trade and employment in other regions, including the High Desert Corridor and the Northwest 138 Corridor Improvement Projects.*

Given that the AVAP proposes such substantial new urban residential, industrial, and commercial development, it is essential that this be *balanced* through SEA expansion, lot size flexibility to protect open space during subdivision, and an effective TDR program that helps implement the Rural Strategy.

Plan Implementation

Significant Ecological Areas

This section calls for frequent—every 2 years—reassessment of SEAs, including their boundaries. While there is nothing inherently wrong with this schedule, given the lengthy nature of public processes, this is virtual continual reassessment. And while public and landowner input is called for, there is *no* mention of the scientific input that made the current boundary revisions credible. SEA boundaries should not be changed absent organized scientific vetting, and this input should be explicitly required in Plan Implementation. Also, given that the current SEA definitions do not include connectivity, the first reassessment should consider adding lands needed for this vital ecological function. A2-6

Transfer of Development Rights Program

EHL strongly supports this "placeholder" language. Particularly, important is the notice given to property owners that "development rights transferred into these areas may either be part off or in addition to those densities established by the Land Use Policy Map (Map 2.1) of this Area Plan." However, it is still essential to move on to program specifics *as quickly as possible*, ideally with adoption concurrent with Area Plan and zoning code adoption. If new zoning regulations are adopted prior to TDR requirements, then landowner expectations will be disconnected from the program and successful implementation will be more difficult. A2-7

Thank you for considering our views.

Yours truly,

Dan Silver
Executive Director

2. Response to Comments

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A2. Response to comments from Dan Silver, Endangered Habitats League, dated September 27, 2014 (Letter 1).

A2-1 It should be noted that a RL-40 designation does not exist in the Adopted Area Plan. The Proposed Project substantially reduces development intensity within the proposed Significant Ecological Areas (SEAs) by converting most of the areas designated for residential development from N1 – Non Urban 1 (0.5 dwelling units/acre) and N2 – Non Urban 2 (1 dwelling unit/acre) to RL20 – Rural Land 20 (1 dwelling unit/20 acres). The use of the RL20 designation for the SEAs was a compromise reached with the Blue Ribbon Committee, and is an integral part of the balanced approach that the Proposed Area Plan achieves. This cannot be changed without affecting the overall integrity of the Proposed Area Plan. The County, as Lead Agency, determined that biological resources would be better protected through the expanded SEA boundaries and the RL20 designation included within the Proposed Project, rather than continued use of the N1 designation. Also, these areas are severely constrained by fault zones, seismic areas and Hillside Management Areas which further limiting potential development. The existing zoning code regulations that are currently in place, including the SEA Ordinance, will be able to regulate developments in these areas so that biological resources are adequately protected.

A2-2 The minimum lot size requirements contained in the Proposed Project were developed to protect the rural character of the Antelope Valley after extensive community outreach. The Proposed Area Plan balances community goals to maintain the rural character of the area with protection of the natural environment through SEAs and the Hillside Management Ordinance. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A2-3 Comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A2-4 The Transfer of Development Rights (TDR) program has been included in Chapter 8 (Plan Implementation) of the Proposed Area Plan, which commits County Department of Regional Planning (DRP) to undertake this program. However, because of its technical complexity, the County needs outside technical expertise to develop the details of this program.

A2-5 Comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A2-6 Comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A2-7 Comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

2. Response to Comments

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LETTER A3– Endangered Habitats League, Letter 2 (17 pages)

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

EHL

September 27, 2014

VIA ELECTONIC MAIL

Carl Nadela, AICP
Regional Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012
Email: tnc@planning.lacounty.gov

RE: Draft Environmental Impact Report (DEIR) for Town and Country – Antelope Valley Area Plan Update (AVAP)

Dear Mr. Nadela:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these DEIR for the AVAP. For your reference, EHL is Southern California's only regional conservation group. Our comments will focus on the adequacy of the DEIR as pertaining to biological resources, fire hazard/public safety, and growth inducement.

EHL generally supports the following two objectives of the project and our comments seek to realize these goals to the extent feasible:

Preservation of open space around existing towns in order to preserve hillside areas and significant ridgelines, conserve biological resources, provide opportunities for recreation, and make more efficient use of existing infrastructure in the core areas.

Conservation of significant resources, including agricultural lands, mineral resources, water supply, and scenic areas.

Biological impacts

We concur with the DEIR that impacts to biological resources from the Proposed Project (Project) are *significant and unavoidable* in terms of species, habitats, connectivity and other aspects. According to CEQA, all feasible mitigation measures *must* be adopted in order to reduce such significant and unavoidable impacts. Our concern is that all feasible mitigation measures have *not* been incorporated into the Project. A3-1

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2. Response to Comments

Specifically, the AVAP has unjustifiably eliminated the fully feasible mitigation measure of applying a lower density category of 1 unit per 40 acres outside of Economic Opportunity Areas (EOAs) but within SEAs, other habitat lands, and farmland. A review of the scientific literature (enclosure) shows the adverse effects of habitat fragmentation and edge are directly related to density, and that these effects become pronounced at 1:40, even though present at even low densities. And the more structures and associated roads, driveways, and mandated brush clearance, the more habitat is lost directly.

As you know, an earlier draft land use map contained the 1:40 category, and it is fully feasible to restore it to lands outside of EOAs that are not already parcelized. Such a category is in widespread use in San Diego County—another county with both extensive urban development and rural areas—and indeed that county utilizes 1:80 in the most remote and fire prone locations. *Furthermore, the 1:40 category is retained in Los Angeles County General Plan 2035 Update outside the AVAP*. The County has presented no evidence that 1:40 is not a feasible mitigation measure for biological impacts in the Antelope Valley. In fact, this is one of the most effective mitigation measures available to reduce a suite of biological impacts. A3-1 cont'd

Another feasible measure to reduce biological impacts is requiring consolidation of development on smaller lots in the least sensitive portion of the site. This is a hugely important mitigation measure and yet the large minimum lot sizes in the community plan and/or zoning code preclude effective site design. In order to conserve biological, agricultural, and scenic resources, lots sizes should have a ½-acre minimum, without requiring special and costly processing. Numerous rural communities in San Diego, such as Fallbrook, have adopted ½-acre minimums as consistent with rural character. No evidence of infeasibility has been provided. A3-2

EHL concurs that *expansion* of the SEA boundaries outside of EOAs as proposed in the Project is feasible. Such expansion should be incorporated into the final DEIR as a *mitigation measure* for biological impacts. A3-3

The Implementation Plan for the AVAP includes a Transfer of Development Rights (TDR) program to shift density from SEAs to Economic Opportunity Areas (EOAs). Because it protects SEAs, TDR is also a feasible mitigation measure for biological resources and should be incorporated into the final EIR as such. However, the documents are not yet clear as to the specifics of the program, and it is essential that options—particularly for purchase of density by EOAs in order to attain baseline or increased density—be left open by the new zoning code, which is to be adopted concurrently with the General Plan. If keeping options open, and indeed facilitating a TDR program, is the County's intent, how will this be accomplished? What language is proposed for the zoning code? We note that when biological open space is otherwise set aside on-site or off-site, this should be credited against TDR requirements. A3-4

Fire hazard

EHL objects to the false conclusion that impacts to fire hazard and public safety are insignificant or else mitigated by the proposed mitigation measures. *Compared to today's on-the-ground conditions as CEQA requires*, the plan will allow construction of hundreds or thousands of new residences within fire hazard zones, albeit at reduced levels compared to the current General Plan. The proposed mitigation measures[1] simply ensure that the Fire Department grants approval to future projects, which means that fees are paid so that there is a fire station within a particular response distance, that brush is cleared around structures, and that building codes are followed.

However, during the wind-driven wildfires that are most damaging—indeed catastrophic—all the engines have already left the station. Response times are irrelevant, and fuel modification cannot work against wind-driven embers. This year's Poinsettia fire in Carlsbad showed that fully code-compliant suburbs will burn[2]. There are far too few fire fighting resources to project all homes in such circumstances and a significant and unavoidable effect of new development in fire hazard zones must be acknowledged and all feasible mitigation measures adopted.

In previous correspondence dated July 7, 2014 (enclosed and incorporated by reference), EHL listed several feasible measures to reduce fire hazard and provided detailed recommendations. These include: A3-5

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[1] **HAZARDS AND HAZARDOUS MATERIALS**

Impact 5.8-5: Portions of the Project Area are within moderate, high, and very high fire hazard zones and could expose structures and/or residences to fire danger.
Less than significant, No mitigation measures are required.

5.14 PUBLIC SERVICES
Impact 5.14-1: Buildout of the Proposed Project would introduce new structures, residents and employees into the LACoFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel.

Potentially Significant	**PS-1** Prior to issuance of building permits, future project applicants/developers shall pay the LACoFD Developer Fee in effect at that time. **PS-2** Each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. Final fire flows shall be determined by LACoFD in accordance with Appendix B of the County Fire Code. The required fire apparatus road and water requirements shall be in place prior to construction. **PS-3** Prior to approval of a tentative map, a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area, as required by Section 1117.2.1 of the County Fire Code, and approved by LACoFD prior to building permit issuance.

[2] See, for example: <http://www.nbcsandiego.com/news/local/Brush-Fire-Carlsbad-Palomar-Airport-San-Diego-Cal-Fire-259251301.html>

2. Response to Comments

- Assigning lower densities of 1:40
- Elevating to Class II Very High Fire Hazard Severity Zones in the Hazard, Environmental, and Resource Constraints Model and Map
- Limiting expansion of the Urban-Wildland Interface (WUI) through strong and effective General Plan policies
- Requiring consolidated site design in Very High Fire Hazard Severity Zones to produce greater defensibility

A3-5 cont'd

Growth inducement

The DEIR errs in concluding that the project will not induce growth. It also errs from a CEQA standpoint in not assessing growth inducement against today's on-the-ground conditions but rather in comparison with the "paper densities" of the current General Plan[3]. With major new infrastructure and highways, and new Economic Opportunity Areas, growth will be induced, for example, between the western and central EOAs along Highway 138.

This significant effect can be mitigated by feasible land use polices regarding subsequent General Plan amendments. As noted in previous correspondence on the NOP dated July 7, 2014 and incorporated by reference, EHL recommends an urban growth boundary around EOAs or at a minimum a land use policy that prohibits extension of urban services between the proposed West and Central EOAs absent another comprehensive update of the AVAP.

A3-6

Thank you for considering our views and we look forward to working with you to improve the AVAP.

With best regards,

Dan Silver
Executive Director

[3] Although approval of the Proposed Project would allow for significant growth as compared to existing conditions, it is substantially less than what is allowed under the Adopted Area Plan. As a result, the Proposed Project, while precedent-setting, reduces potential growth-inducing impacts as compared to the Adopted Area Plan. (DEIR at page 10-3.)

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

July 7, 2014

Connie Chung, AICP, Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012
Email: genplan@planning.lacounty.gov

RE: 2014 Draft General Plan 2035 and Draft Environmental Impact Report for the Los Angeles County General Plan Update (SCH#2011081042)

Dear Ms. Chung:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on this project. For your reference, EHL is Southern California's only regional conservation group. We will focus on the environmental impacts of new development, and planning and mitigation strategies to reduce those impacts. General comments and recommendations will be provided first, followed by specific comments and recommendations.

GENERAL COMMENTS

EHL first wishes to voice its strong support for the expanded Significant Ecological Areas (SEAs) that are proposed[1]. These are a foundation for the future of the County and are the repository of the citizens' natural heritage.

Next, EHL supports "smart growth" planning that reduces the land consumed for development, reduces GHG emissions, builds around transit corridors, and protects natural resources while accommodating population and job growth. But due to a long history of large lot parcelization in the County, the goal of environmental protection is challenging. And even where lands are rezoned to 1 unit per 20 acres, this will be insufficient to protect the most important biological values, that is, the SEAs. Such densities, on top of existing parcelization, create habitat fragmentation and edge effects incompatible with maintaining existing biological values. (See enclosure, documenting adverse impacts beginning roughly at 1:40.)

[1] When determining the compatibility of the proposed AVAP with an affected SEA, it would make sense to consider the unique and exceptional circumstance of the Tejon Ranch Land-Use and Conservation Agreement, which in effect clusters development on a larger scale, albeit with some of the resulting ecological benefit occurring on the other side of a jurisdictional boundary.

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2. Response to Comments

We therefore request that the General Plan 2035 and its EIR contain four measures to address the adverse impacts of development and to achieve the goal of resource protection. Where possible, these should be included in the General Plan and its EIR as feasible *mitigation measures* for the reduction of biological and other impacts, allowing for subsequent, expeditious tiering by future development during CEQA review.

Reduced densities in environmentally constrained land

As you consider the framework for land use, we urge that land use designations—and the densities therein—fully reflect infrastructure, public safety, and environmental constraints. It costs the taxpayer to provide services, utilities, roads, and police and fire protection to more remote locations. Often, such areas have high wildlife values, including but not limited to Significant Ecological Areas (SEAs). These same areas typically are high fire hazard. Reducing density automatically puts less life and property at risk of fire and, during a fire event, ensures that limited fire-fighting resources are spent stopped the fire's spread rather than defending dispersed home sites that should not have been built in the first place. As noted below, the draft land use map does not sufficiently take into account fire hazard and should be improved.

Therefore, outside of urban centers and Economic Opportunity Areas, densities should be Rural, preferably at the RL40 category but at RL20 or RL10 where existing patterns of parcelization preclude the lowest density category[2]. *This is particularly vital within SEAs.* Estate and ranchette designations (H2, R1, R2, and R5) rarely support agricultural uses and are the epitome of unwise, inefficient, auto and GHG-intensive, and land-consumptive land use. Such categories should only be used when existing parcelization has already converted an area to "rural sprawl."

By down-planning estate densities to rural categories, the County of San Diego found billions of dollars in taxpayer savings[3] and will avoid putting life and property at risk of wildfire. Los Angeles County should follow suit, and instead focus growth at higher densities in appropriate locations. Recommendations regarding locations where the current draft land use map does not follow these principles will follow under specific comments.

Transfer of development rights (TDR)

In order to protect the natural resource value of SEAs, Los Angeles County needs an effective strategy in addition to traditional acquisition and to the mechanisms (e.g., set asides, mitigation) in the SEA Ordinance.

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[2] The unique circumstance of the Tejon Ranch Land-Use and Conservation Agreement may justify an exception to an RL designation because the Agreement effectively concentrates urban development on a small portion of its holdings, facilitating conservation over vast areas.

[3] The San Diego County General Plan Update EIR found savings of $1.6 billion in road construction costs alone, irrespective of ongoing maintenance. Also see <http://www.sdcounty.ca.gov/pds/docs/bos_may03_report.pdf> at page 21, Public Costs, for comparison of municipal *vs* unincorporated service costs.

2

TDR is a proven mechanism to preserve open space and one that creates positive outcomes for property owners who sell development rights and those who acquire them. It gives economic value to the open space that the public desires. TDR may be of the classic variety[4] or streamlined as a fee program. The latter would require payment of an open space fee as a condition of obtaining density and would allow the agency receiving the fees to effectively prioritize conservation properties. TDR should always use the post-Update, rezoned density as baseline for sending areas and should require participation by receiving sites not only to increase density above a baseline (bonus density) but also to attain plan density (at least beyond the lower end of the density range). Coordination with nearby cities would be ideal.

Because it shifts growth from more remote and habitat-rich areas to locations closer to jobs and services, TDR could be incorporated into the General Plan and its EIR as mitigation for impacts to biological resources, traffic, GHG, aesthetics, etc. We recommend retaining an experienced consultant to explore options and fashion a program, and that a work plan be advanced as soon as possible, so as to meet the target of implementation 1-2 years post Plan adoption.

Site design

In order to implement biologically sound site design during the land use process, the General Plan 2035 should "decouple" lot size from density. This allows development to be consolidated on smaller lots in the last sensitive portion of the site. To maintain community character in non-urban locations, a minimum lot size of ½-acre should be set, as it has in many rural San Diego communities. To obtain smaller lots via Density Controlled Development adds additional layers of time and money for project applicants, which discourages better planning and resource protection. Smaller lots should be available "by right" and routinely.

Such consolidation of development should be *mandatory* at the Rural designations of RL5 - RL40, and should be used in the EIR as a key *mitigation measure* for biological, public safety, agricultural, and other impacts. The land set aside through such a subdivision could serve habitat or agricultural purposes but could not be developed in the future. An "off the shelf" model that provides standards, guidelines, and allowable uses (including agriculture) in the resulting open space is San Diego County's Conservation Subdivision Program[5].

Growth policies

The County may designate Economic Opportunity Areas (EOAs) or other designations or overlays that concentrate jobs and housing and provide improvements in services and transportation and water and sewerage infrastructure. These are growth

[4] For example, see the City of Livermore's program at <http://www.cityoflivermore.net/civicax/filebank/documents/3051/>.
[5] See <http://www.sdcounty.ca.gov/pds/advance/conservationsubdivision.html>.

3

inducing. As a mitigation measure, General Plan 2035 should include protections against the sprawl that would otherwise follow such development, particularly along highway corridors. The most worrisome case is Highway 138. EHL recommends an urban growth boundary around EOAs or at a minimum a land use policy that prohibits extension of urban services between the proposed West and Central EOAs absent another comprehensive update of the General Plan.

SPECIFIC COMMENTS

Land use maps

The Hazard, Environmental, and Resource Constraints Model and Map (Table C.1; Figure C.1) are good tools for assigning land use designations. Areas with constraints should receive the lower end of the density scale. *However, we recommend elevating Very High Fire Hazard Severity Zones to Class II.* In today's world, where the inevitability of wind-driven fire is recognized, it is wholly irresponsible to "dig the hole deeper" by approving more and more at-risk development. Along with the SEA designation, Very High Fire Hazard Severity Zones should result in RL40 (or RL20 or RL20 if existing parcelization predominates).

A review of the draft land use maps shows that several areas with SEA, other biological, or fire constraints have inappropriately high densities. These areas include West Chatsworth in the Santa Monica Mountains, around La Crescenta in the San Gabriel Mountains foothills, and Diamond Bar/Tonner Canyon in the Whittier-Chino-Puente Hills. These locations should be redesignated as RL40, or RL20 if existing parcelization precludes the lower category. It should be noted that parcel sizes in the Diamond Bar area are currently as large of 160 acres.

Site design

As noted, above, EHL recommends that minimum lot sizes in Rural and Estate categories be reduced to ½-acre. EHL recommends the following new Land Use Policy, modeled on a draft policy in Riverside County's GPA 960 update[6].

> *In Very High Fire Hazard Zones and in locations where biological or agricultural resources are present, require consolidated development on lots smaller than the underlying land use designation would allow. The density yield of the underlying land use designation should be consolidated on one- half-acre lots; however, for sites located adjacent to existing, larger estate lots, 10,000 square foot minimum lots may be considered.*

Draft goals and policies

[6] See <http://planning.rctlma.org/Portals/0/genplan/general_plan_2014/GPA960/GPAVolume1/LandUseElement-%20GPA%20No%20960%20Volume%201%202014-02-20.pdf> at page LU-56.

4

Conservation and Natural Resources Element

C/NR-1 SEA Preservation Program

EHL supports these mechanisms to achieve permanent protection of SEA resources, and urges quicker timelines and supporting work plan budgets.

C/NR-2 Mitigation Land Banking Program/Open Space Master Plan

EHL supports these mechanisms to achieve permanent protection of SEA resources while simultaneously streamlining development in less biologically important locations.

C/NR-4 Native Woodland Conservation Management Plan

EHL supports planning for the conservation of these important woodland communities but urges a 3-5 year timeline.

C/NR-5 Scenic Resources Ordinance

EHL supports preserving the scenic views that establish a sense of place.

Goals and Policies for Open Space Resources

EHL supports the proposed language for Goal C/NR 1 and Goal C/NR 2, and associated policies. *We note that all of this is predicated on securing expanded SEA boundaries.*

Goals and Policies for Biological Resources

EHL concurs with adding shrub habitats such as coastal sage scrub to the "including" list, as this community is very depleted yet still very biodiverse.

Policy C/NR 3.3 should not be limited to riparian resources, as upland communities are also badly in need of restoration. An example is returning non-native grassland to historic coastal sage scrub, which is an ongoing project in several Orange County locations.

Sensitive Site Design

Policy C/NR 3.8

We suggest that following improvement, as "discourage" is far too weak a word to comport with either CEQA or SEA policies.

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2. Response to Comments

~~Discourage~~ Limit development in areas with identified significant biological resources, such as SEAs.

Another option (from San Diego County's General Plan) is:

Habitat Protection through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.

Policy C/NR 3.9

This policy and its component parts are *strongly* supported as they provide the necessary General Plan basis for on-the-ground implementation of SEA goals. Absent this policy, SEA protection would remain abstract and ineffectual. We particularly support the additional elements for contiguity and connectivity, both on- and off-site.

Policy C/NR 3.10

We agree that at the General Plan level, it is wisest to express mitigation requirements in terms of general goals rather than, for example, as "in kind" or "flexible," reserving more specific delineation to the SEA Ordinance or to County biological guidelines for CEQA implementation.

Policy C/NR 3.11

The weak term "discourage" in relation to riparian and wetland habitats would undermine CEQA, Calif. Dept. of Fish and Wildlife, and federal Clean Water Act standards and regulations. A much better option is found in San Diego County's General Plan Conservation and Open Space Element[7]:

Wetland Protection. Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.

Minimize Impacts of Development. Require development projects to:
• Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and
• Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species.

Woodland Preservation Policy C/NR 4.1

[7] See <http://www.sdcounty.ca.gov/pds/gpupdate/docs/BOS_Aug2011/C.1-4_Conservation_and_Open_Space.pdf> at page 5-9.

6

We support this language and extending the policy to other native woodlands.

Land Use Element

Goal LU 3 Growth Management

Policy LU 3.1: Protect and conserve greenfield areas, natural resources, and SEAs.

EHL supports this policy.

Policy LU 3.2: Discourage development in areas with environmental resources and/or safety hazards.
Policy LU 3.3: Discourage development in greenfield areas where infrastructure and public services do not exist.

EHL concurs with the intent of these policies yet the term "discourage" is weak and ineffective. We suggest substitution of the term "limit" which is consistent with the SEA program.

Goal LU 4 Infill Development

EHL supports these policies.

LU-6 Transfer of Development Rights Program

EHL strongly supports this well-conceived policy and the work plan it outlines. We appreciate it being advanced to a Year 1-2 schedule and urge all appropriate budgeting.

LU-7 Adaptive Reuse Ordinance

As a vital and proven way to revitalize older communities, EHL support this item.

Safety Element

Goal S 2 Flood Hazards

Policy S 2.1: Discourage development in the County's Flood Hazard Zones.

EHL concurs with the intent of this policy yet the term "discourage" is weak and ineffective. We suggest substitution of the term "limit."

Goal S 3 Fire Hazard

Policy S 3.1: Discourage development in VHFHSZs, particularly in areas with significant biological resources.

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2. Response to Comments

Both the Safety and Land Use Elements should contain much stronger policies to reduce the life and property put at risk though ill-sited development. There is an enormous threat to public safety throughout the Very High Fire Hazard Zone and it is essential that decision-makers have an effective basis in the General Plan to limit development in these locations in response. It is not enough to improve site design and require defensible space. "Preventive medicine" on the land use planning front is needed, as well. Therefore, Policy S 3.1 should substitute the term "limit" for "discourage" to reflect the fact that we are living year-to year-in wildfire emergencies.

EHL also recommends the inclusion of a critically important new land use policy *to limit the expansion of the Wildland Urban Interface, or WUI*. The WUI is where homes are located near or among fire prone lands. This interface is where wildfires ignite, where loss of life and property occurs, and where firefighters spend finite time and resources defending structures rather than stopping the spread of wind-driven fires. We recommend adding this Land Use policy to the appropriate section of that element:

> *Assign land uses and densities in a manner that minimizes development in Very High Fire Hazard Severity Zones.*

Note that this policy is essential *verbatim* from San Diego County's General Plan, adopted in 2011[8]. A discussion on the importance of reducing development intensity in Very High Fire Hazard Severity Zones should be added to the Land Use and Safety Elements to accompany this new policy.

Policy S 3.7: Consider siting and design for developments located within VHFHSZs, particularly in areas located near ridgelines and on hilltops, to reduce the wildfire risk.

EHL recommends strengthening this policy as follows. The question is whether Los Angeles County is serious about reducing fire hazard or merely wants to consider it.

> *Policy S 3.7: ~~Consider siting~~ Site and design ~~for~~ developments located within VHFHSZs, ~~particularly~~ such as in areas located near ridgelines and on hilltops, to reduce the wildfire risk.*

In addition, the following policy should be added to the Safety Element to add another important dimension to the site design topic. Note that this is a modification of a draft policy in Riverside County's current GPA 960 Update.

> *Require property owners to utilize consolidated site design within Very High Fire Hazard Severity Zones by siting development on a compact footprint.*

Consolidated site design, as opposed to dispersed development, produces home sites easier to defend during a fire event and requires far less destruction of vegetation in order to produce defensible space.

[8] See <http://www.sdcounty.ca.gov/pds/gpupdate/docs/LUE.pdf> at page 3-26.

8

EHL appreciates the progress being made in this historic General Plan 2035 update and looks forward to continuing to work with the Department of Regional Planning for successful protection of biological resources and sustainable patterns of land use.

Yours truly,

Dan Silver
Executive Director

Enclosure: Conservation Biology Institute, *Analysis of General Plan-2020 San Diego County*, December 2005

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2. Response to Comments

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

EHL

July 7, 2014

Carl Nadela, AICP, Regional Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012
Email: tnc@planning.lacounty.gov

RE: Notice of Preparation for Los Angeles County Antelope Valley Areawide General Plan Update (AVAP)

Dear Mr. Nadela:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on this project. For your reference, EHL is Southern California's only regional conservation group.

EHL first wishes to voice its strong support for the expanded Significant Ecological Areas (SEAs) that are proposed[1]. These are a foundation for the future of the County and are the repository of the citizens' natural heritage.

"Smart growth" planning reduces the land consumed for development, reduces GHG emissions, and protects natural resources while accommodating population and job growth. We therefore support a framework of Town Centers and Rural Preserve Areas. Contingent upon location, Economic Opportunity Areas (EOAs) also make sense. Our comments focus on how to implement these goals.

Due to a long history of large lot parcelization in the Antelope Valley, achieving the town and preserve framework will be challenging. Even where lands are rezoned to 1 unit per 20 acres, this will be insufficient to protect the biological values of the most important preserve areas, that is, the Significant Ecological Areas (SEAs). Such densities, on top of existing parcelization, create habitat fragmentation and edge effects incompatible with maintaining existing biological values. (See enclosure, documenting adverse impacts beginning roughly at 1:40.) In addition, the EOAs as proposed will cause significant growth induction along highway infrastructure, which would obviate the goal of community separation via rural preserves.

We therefore request that the Antelope Valley Update and its EIR contain four measures to address the adverse impacts of development and to achieve the goal of

[1] When determining the compatibility of the proposed AVAP with an affected SEA, it would make sense to consider the unique and exceptional circumstance of the Tejon Ranch Land-Use and Conservation Agreement, which in effect clusters development on a larger scale, albeit with some of the resulting ecological benefit occurring on the other side of a jurisdictional boundary.

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preserves. Where possible, these should be included in the AVAP as feasible *mitigation measures* for the reduction of biological and other impacts, allowing subsequent, expeditious tiering by future development during CEQA review.

Reduced densities in environmentally constrained land

As you consider the framework for land use, we urge that land use designations—and the densities therein—fully reflect infrastructure, public safety, and environmental constraints. It costs the taxpayer to provide services, utilities, roads, and police and fire protection to more distant locations. Often, such areas have high wildlife values, including but not limited to Significant Ecological Areas (SEAs). These same areas typically have high fire hazard. Reducing density automatically puts less life and property at risk of fire and, during a fire event, ensures that limited fire-fighting resources are spent stopping the fire's spread rather than defending dispersed home sites that should not have been built in the first place.

Therefore, outside of urban centers and EOAs, densities should be Rural, preferably at the RL40 category but at RL20 or RL10 where existing patterns of parcelization preclude the lowest density category[2]. *Within SEAs, it is particularly vital to retain the RL40 densities that were changed in the most recent draft map to RL20.* But in any case, RL40 within SEAs and other habitat areas must be analyzed in the DEIR as part of an Environmentally Superior alternative. Estate and ranchette designations (H2, R1, R2, and R5) rarely support agricultural uses and are the epitome of inefficient, auto and GHG-intensive, and land-consumptive land use. Such categories should only be used when existing parcelization has already converted an area to "rural sprawl."

By down-planning estate densities to rural categories, the County of San Diego found billions of dollars in taxpayer savings[3] and will avoid putting life and property at risk of wildfire. Los Angeles County should follow suit, and focus growth at higher densities in appropriate locations.

Transfer of development rights (TDR)

In order to protect the natural resource value of SEAs, Los Angeles County needs an effective strategy in addition to traditional acquisition and to the mechanisms (e.g., set asides, mitigation) in the SEA Ordinance. This is particularly the case in the Antelope Valley, where scattered estate and ranchette subdivision is the norm, rather than large development projects that can more effectively concentrate density and preserve open space through site design.

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[2] The unique circumstance of the Tejon Ranch Land-Use and Conservation Agreement may justify an exception to an RL designation because the Agreement effectively concentrates urban development on a small portion of its holdings, facilitating conservation over vast areas.
[3] The San Diego County General Plan Update EIR found savings of $1.6 billion in road construction costs alone, irrespective of ongoing maintenance. Also see <http://www.sdcounty.ca.gov/pds/docs/bos_may03_report.pdf> at page 21, Public Costs, for comparison of municipal *vs* unincorporated service costs.

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2. Response to Comments

TDR is a proven mechanism to preserve open space and one that creates positive outcomes for property owners who sell development rights and those who acquire them. It gives economic value to the open space that the public desires. TDR may be of the classic variety[4] or streamlined as a fee program. The latter would require payment of an open space fee as a condition of obtaining density and would allow the agency receiving the fees to effectively prioritize conservation properties. TDR should always use the post-Update, rezoned density as baseline for sending areas and should require participation by receiving sites not only to increase density above a baseline (bonus density) but also to attain plan density (at least beyond the lower end of the density range). Coordination with nearby cities would be ideal.

Because it shifts growth from more remote and habitat-rich lands to locations closer to jobs and services, TDR could be incorporated into the EIR as mitigation for impacts to biological resources, traffic, GHG, aesthetics, etc. We recommend retaining an experienced consultant to explore options and fashion a program.

Site design

In order to implement biologically sound site design during the land use process, the AVAP should "decouple" lot size from density. This allows development to be consolidated on smaller lots in the last sensitive portion of the site. To maintain community character in non-urban locations, a minimum lot size of ½-acre should be set, as it has in many rural San Diego communities.

Such consolidation of development should be *mandatory* at the Rural designations of RL5 - RL40, and should be used in the EIR as a key *mitigation measure* for biological, public safety, agricultural, and other impacts. The land set aside through such a subdivision could serve habitat or agricultural purposes but could not be developed in the future. An "off the shelf" model that provides standards, guidelines, and allowable uses (including agriculture) in the resulting open space is San Diego County's Conservation Subdivision Program[5].

Growth policies

Economic Opportunity Areas (EOAs) that concentrate jobs and housing and provide improvements in services and transportation and water and sewerage infrastructure are growth inducing. As a mitigation measure, it is thus essential that the AVAP include protections against the sprawl that would otherwise follow such development, particularly along highway corridors. The most worrisome case is Highway 138. EHL recommends an urban growth boundary around EOAs or at a minimum a land use policy that prohibits extension of urban services between the proposed West and Central EOAs absent another comprehensive update of the AVAP.

[4] For example, see the City of Livermore's program at <http://www.cityoflivermore.net/civicax/filebank/documents/3051/>.
[5] See <http://www.sdcounty.ca.gov/pds/advance/conservationsubdivision.html>.

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EHL looks forward to continuing to work with the County of Los Angeles on a successful Update.

Yours truly,

Dan Silver
Executive Director

Enclosure: Conservation Biology Institute, *Analysis of General Plan-2020 San Diego County*, December 2005

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2. Response to Comments

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A3. Response to comments from Dan Silver, Endangered Habitats League, dated September 27, 2014 (Letter 2).

A3-1 It should be noted that a RL-40 designation does not exist in the Adopted Area Plan. The Proposed Project substantially reduces development intensity within the proposed Significant Ecological Areas (SEAs) by converting most of the areas designated for residential development from N1 – Non Urban 1 (0.5 dwelling units/acre) and N2 – Non Urban 2 (1 dwelling unit/acre) to RL20 – Rural Land 20 (1 dwelling unit/20 acres). The use of the RL20 designation for the SEAs was a compromise reached with the Blue Ribbon Committee, and is an integral part of the balanced approach that the Proposed Area Plan achieves. This cannot be changed without affecting the overall integrity of the Proposed Area Plan. The County, as Lead Agency, determined that biological resources would be better protected through the expanded SEA boundaries and the RL20 designation included within the Proposed Project, rather than continued use of the N1 designation. Also, these areas are severely constrained by fault zones, seismic areas and Hillside Management Areas which further limiting potential development. The existing zoning code regulations that are currently in place, including the SEA Ordinance, will be able to regulate developments in these areas so that biological resources are adequately protected.

A3-2 The minimum lot size requirements contained in the Proposed Project were developed to protect the rural character of the Antelope Valley after extensive community outreach. The Proposed Area Plan balances community goals to maintain the rural character of the area with protection of the natural environment through SEAs and the Hillside Management Ordinance. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A3-3 Expansion of the SEA boundaries is component of the Proposed Project and is therefore not necessary as a mitigation measure.

A3-4 The Transfer of Development Rights (TDR) program has been included in Chapter 8 (Plan Implementation) of the Proposed Area Plan, which commits County Department of Regional Planning (DRP) to undertake this program. However, because of its technical complexity, the County needs outside technical expertise to develop the details of this program.

A3-5 As discussed in Section 5.14.1 of the DEIR, *Fire Protection and Emergency Services*, potential impacts related to fire hazards are reduced to a less than significant level through compliance with the County Fire Code and mitigation measures in the DEIR. In addition, the Proposed Area Plan limits potential development in Very High Fire Hazard Severity zones through appropriate land use designations with very low residential densities, as indicated on the Proposed Area Plan Land Use Policy Map.

2. Response to Comments

A3-6 Chapter 10 of the DEIR analyzes the growth-inducing impacts of the Proposed Project. The analysis contained in the DEIR acknowledges that the Proposed Project will result in growth-inducing impacts related to infrastructure and direct and indirect population and employment growth, as compared to existing on the ground conditions. However, in discussing whether approval of this project will involve some precedent-setting action, the DEIR accurately discloses that the Proposed Project reduces allowable housing and population growth, as compared to the Adopted Area Plan.

Note: The commenter attached previous correspondence sent during the public review period for the EIR's Notice of Preparation. The first letter is a comment letter on the County of Los Angeles General Plan Update EIR and does not relate to the Proposed Project. The second letter is a Notice of Preparation (NOP) comment for the Proposed Project and was taken into consideration during preparation of the DEIR and therefore does not require an additional response here.

LETTER A4 – Center for Biological Diversity (12 pages)

CENTER for BIOLOGICAL DIVERSITY *Because life is good.*

protecting and restoring natural ecosystems and imperiled species through science, education, policy, and environmental law

via email and USPS

10/3/2014

Carl Nadela, AICP
Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012
Email to: tnc@planning.lacounty.gov

RE: Comments on Draft Environmental Impact Report and Draft Antelope Valley Area Plan, Los Angeles County– August 2014

Mr. Carl Nadela,

These comments are submitted on behalf of the Center for Biological Diversity (Center) regarding the Draft Environmental Impact Report and Draft Antelope Valley Area Plan (DAVP), Los Angeles County– August 2014. At the Center for Biological Diversity, we believe that welfare of human beings is deeply linked to nature – to the existence in our world of vast diversity of wild animals and plants. Because diversity has intrinsic value, and because its loss impoverishes society, we work to secure a future for all species, great and small, hovering on the brink of extinction. We do so through science, law and creative media, with a focus on protecting lands, waters and climate that species need to survive. We want those that come after us to inherit a world where the wild is still alive. The Center has over 775,000 staff, members and on-line activists in California and throughout the United States, including those who live in, know and enjoy the biological diversity and world class landscape of northern Los Angeles County, including the Antelope Valley area.

Los Angeles County is a globally unique county which spans incredible topographic diversity – from the Pacific Ocean to Mount San Antonio (Mt. Baldy) at 10,068 feet and back down to the Mojave Desert. Because of the topographic diversity often coupled with significant development, many rare, threatened and endangered species occur within the County. While much of the coastal basin has been developed, the mountainous areas and desert areas remain primarily ecologically intact and home to numerous rare species. The Draft Antelope Valley Area Plan (AVAP) is a key document where the County has an opportunity to craft a plan that will protect and sustain our world class natural heritage and precious water.

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www.BiologicalDiversity.org

2. Response to Comments

I. Lower Density Zoning Needs to Be Included

Based on the ongoing drought[1], climate change[2], increasing fire frequency[3], the County needs to address changing circumstances to prevent checkerboard rural sprawl which typically damages natural hydrologic regimes impacting water availability, and encourages development in areas of high hazard zones, which is also a significant drain on county fire fighting resources. By proposing and adopting zoning that includes RL 40 (1 du/40 gross acres) and RL 80 (1du/80 gross acres) especially in areas with important ecological, hydrological values and in areas with high fire and seismic hazards, the County would more effectively maintain the world class natural resources of Los Angeles County while reducing costly taxpayer-supported services and protecting residents from harm. We request that these zoning densities be incorporated into the DAVAP especially within the proposed SEAs, and Hillside Management Areas, in Seismic Zones[4] and in High and Very High Fire Hazard Zones[5]. A4-1

II. Inappropriate and Conflicting Land Use/Zoning Proposals

The DAVAP includes the yet-to-be proposed Centennial project located in the western part of the Antelope Valley (see Attachments 1 and 2). The proposed land use designations of H5 – high density residential 5 (0-5 du / net ac), RL1 - Rural Land 1 (1 du/ gross ac) and IL – Light Industrial is in complete conflict with the surrounding land use designations of OS-C – Open Space Conservation, and RL 20, 10 and 2 – Rural Land 20 (1 du/20 gross ac), Rural Land 10 (1 du/10 gross ac) and Rural Land 2 (1 du/2 gross ac) respectively. In addition, the RL1 and IL and most all of the H5 are located in a proposed Significant Ecological Area (SEA). This proposed SEA designation highlights the ecological value of this area and conservation should be the primary focus for this area. It should require zoning much higher than H5, indeed we request a designation of OS-C, RL 80, 40 or at least 20 to be compatible with the surrounding proposed land use designation in this very important wildlife connectivity area[6] that is partially located in the proposed SEA. Indeed other hazards (see below) support a much lower density zoning in this area than is proposed in the DAVAP A4-2

While we recognize that development of private lands are allowed in SEAs, high density and industrial land use designations are inappropriate in SEAs and will only increase conflicts between wildlife, views and development. Interestingly and appropriately, **none** of the other SEA areas in the DAVAP have the extensive high development land use proposed within the San Andreas SEA boundary. West of the Centennial area, the document proposes CR – Commercial Rural designations in areas again that are proposed SEAs and surrounded by OS-C – Open Space Conservation, RL 20 - Rural Land 20 (1 du/20 gross ac) and OS-PR (Open Space Parks and Recreation). We request the County remove the H5, RL1, CR and IL designations and conform zoning to land use designations that are compatible with the proposed San Andreas SEA

1 http://ca.water.usgs.gov/data/drought/
2 http://cal-adapt.org/blog/2011/may/10/golden-state-at-risk/
3 http://www.cafiresci.org/climate-change/
4 http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm
5 http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf
6 http://www.scwildlands.org/reports/SCML_Tehachapi.pdf ;

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designation. The County need not create land use conflicts by layering incompatible land use designations on top of the same area. A4-2 cont'd

Regarding the Rural Preservation Strategy map and land use section, the Rural Preserve Areas are defined as "largely undeveloped and generally not served by existing infrastructure and public facilities. Many of these areas contain environmental resources, such as Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas" (Land Use Element at pg. LU-7).

The DAVAP unreasonably tries to justify overlaying an "Economic Opportunity Areas" (EOAs) on top of the San Andreas SEA and Rural Land Use designations, based on a proposed Northwest 138 Corridor Improvement Project, which is a proposed project that is still at the scoping stage[7], with full details of the proposal unavailable and more importantly – funding - unclearly defined. The DAVAP appears to be taking an unsupported "build and they will come" approach in one of the most remote corners of the County, well away from County services that would facilitate sprawl development which is an anathema to contemporary planning. A4-3

While the Center's focus is protecting rare and common species and their habitats, one key aspect to achieve habitat protection and ensure ecological sustainability is to avoid sprawl development. The County needs to concentrate growth in compact walkable urban centers and avoid sprawl. The Central EOAs are more appropriately proposed in and around Palmdale/Lancaster where compact, transit-oriented, walkable, bicycle-friendly land use can be implemented. Planning Economic Opportunity Areas and Rural Town Areas in far-flung regions of the County where little County infrastructure including emergency services is in place, and will be expensive to maintain is an anathema to smart planning. A4-4

The DAVAP identifies the western sections of Highway 138 as a scenic drive (Map 4.2) and we agree with this proposed designation. However, the proposal to change the zoning to CR (commercial rural), IL, RL1 and H5 and overlay an EOA conflicts with the proposed designation because there is nothing scenic about commercial, industrial or high density housing development. The DAVAP should protect the scenic drive by assigning realistic zoning in keeping with the scenic, ecological and current zoning designations. Additionally, conflicts with applicable planning documents, particularly those adopted for the purpose of avoiding or mitigating environmental impacts, constitute adverse impacts that a public agency must analyze and mitigate. (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.AppAth 903, 930.) A4-5

Virtually the whole of the yet-to-be-proposed Centennial project area and Gorman area are identified as Rural Preserve Areas. Proposing land use categories of HR5, RL1, CR and IL in these areas clearly undermines preserving rural areas and, as mentioned above, sets up conflicting designations. We request that the County remove the Economic Opportunity Area overlay from this area and maintain the Rural Preserve Area designation and place more appropriate zoning OS-C, RL 80, 40, and 20 in the area. A4-6

7 http://www.metro.net/projects/nw138/

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2. Response to Comments

III. Hazards

Goal PS 2 fails to present reasonable goals for public protection and geologic hazards which include seismic hazards. The map that is referenced (Land Use Map 2.1) fails to identify any referenced "Seismic Zones". The County must assure that it properly notifies its residents of seismic hazards. Further, the County must disclose and analyze whether any proposed land uses would result in significant impacts from exposing people or structures to earthquake risks. California Environmental Quality Act (CEQA) Guidelines, App. G § VI(a). The language also takes a narrow view of seismic hazards, by stating that "Prohibit the construction of new structures on or across a fault trace" (at PS-3). Generally earthquakes occur in a belt of seismicity often located within at least about 50 km of fault zones like the San Andreas[8]. Additionally, the DAVAP fails to recognize other known faults in the area including the Garlock fault which causes the uplift of the Tehachapi and southern Sierra Mountains. The Garlock and the San Andreas faults converge in the west end of the DAVAP creating a seismically prone area. Therefore the zoning in the area of these significant faults needs to be reduced to OS-C, RL 80, 40, or 20 to increase public protection and the County must assure that all development conforms with the Alquist Priolo Special Studies Zone Act. A4-7

While Goal PS1 presents reasonable goals for public protection and fire hazard, the map that is referenced (Land Use Map 2.1) fails to identify the High and Very High Fire Hazard Areas[9]. The County must disclose and analyze whether any proposed land uses would result in significant impacts from exposing people or structures to earthquake risks. CEQA, App. G § VIII(h). Failure to properly disclose those locations prohibits the County from adequately analyzing and avoiding those fire risks. These areas should be clearly identified and proposed to be zoned at RL 40 and 80 designations to increase public protection. A4-8

If construction moves forward in High and Very High Fire Hazard Areas, an additional fire impact fee needs to be included in order for the County to recoup the costs of providing the necessary fire-fighting services, especially in light of climate change where modeling indicates Los Angeles County will increased fire frequency and potentially larger fires[10].

IV. Proposed Amendments to the Zoning Code Unnecessary

The new proposed amendment to the zoning code for C-RU (Rural Commercial Zone) and the MXD-RU (Mixed Use Rural Zone) are unnecessary because the existing CR (Rural Commercial) and MU-R (Mixed Use Rural) already adequately include this type of zoning. A4-9

8 http://www.conservation.ca.gov/cgs/rghm/psha/ofr9608/Pages/Index.aspx
9 http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf
10 http://www.ucsusa.org/sites/default/files/legacy/assets/documents/global_warming/preparing-for-climate-change-impacts-in-los-angeles.pdf

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V. Draft Environmental Impact Report

The Center provided scoping comments on the NOP on July 11, 2014, however, they were not incorporated into the Table 1-2 Summary of NOP comments. We attach them here again for inclusion in the record (Attachment 3).

Alternatives

While the DEIR analyzes a "Reduced Intensity Alternative" and an "Alternative Land Use Policy Map", both of these alternatives allow for unsustainable growth. The County must develop a reasonable range of alternatives that proposes a true environmentally superior alternative. A4-10

Executive Summary

Section 1.8 of the Executive Summary - Summary of the Environmental Impacts, Mitigation Measures, and Levels of Significance after Mitigation is unclear as to which alternative this table summarizes. Regardless, of the seventeen analyzed "Environmental Impact" areas, eight of them were analyzed to have "significant and unavoidable impacts" after mitigation. These "areas" include agriculture and forestry, air quality, biological resources, cultural resources, green house gas emissions, minerals, noise and transportation and traffic. Surely the DAVAP can craft an area plan that reduces impacts to these critical resources. Proposing a plan where virtually half of the resource A5-2 will sustain significant and unavoidable impacts violates the requirement that the County must adopt all feasible mitigation measures and alternatives to avoid significant impact. Pub. Res. Code § 21002.1. A4-11

Significant Ecological Areas

We support adopting the proposed Significant Ecological Areas (SEAs) because of the higher level of environmental review that SEAs warrant. We also support adopting OS-C, RL 80. 40 and 20 zoning designations in the SEAs. We also support clustering of development and development at the edge of the SEAs as much as possible to minimize the habitat fragmentation[11] and edge effects[12]. A4-12

Plant Communities

The DEIR fails to adequately disclose and analyze biological resources because it combines annual grasslands and perennial grasslands—an important rare plant community—together as a single community. Annual grasslands are often dominated by non-native Mediterranean grasses whereas, perennial grasslands are typically dominated native bunchgrasses. Indeed the grasslands on and around the Centennial project are one of the largest remaining native grasslands left in the state of California[13], certainly a legacy worthy of protection at the highest levels. A4-13

11 http://www.els.net/WileyCDA/ElsArticle/refId-a0021904.htm
12 http://carmelacanzonieri.com/library/6108-LandscapeEcoPlanning/Theobald-EstimatingCumulativeEffectOfDevOnWildlife.pdf
13 http://www.scwildlands.org/reports/ProposedReserve_TejonRanch.pdf

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2. Response to Comments

The DEIR fails to analyze impacts to the world renowned and locally beloved wildflower fields in the Antelope Valley and near Gorman. While the DEIR identifies some other sensitive plant communities (at PDF pg. 26 of the Biological Resources section – no page number available) coastal sage scrub, walnut woodlands, and all marshes are also considered State sensitive plant communities[14]. While these plant communities are documented to occur in the AVAP area by the DEIR, they are not identified as being sensitive plant communities or analyzed for impacts. The County must disclose and analyze all potentially significant impacts to recognized sensitive or special status plant communities. CEQA, App. G § IV(a). A4-14

Biological Resources Impact Analysis
We agree with the DEIR's analysis that impacts to biological resources from the proposed DAVAP would significant and unavoidable. Therefore, we request that the DAVAP be reworked to avoid the significant and unavoidable impacts. *See* Pub. Res. Code § 21002.1. A4-15

Growth Assumptions
While we recognize that the alternatives reduce the amount of growth proposed for the AVAP area from the current plan, based on smart growth principles and trends in population, the DEIR fails to incorporate an environmentally superior alternative that more accurately reflects current demographic growth in the County. Infill of existing communities and growth along the edges communities provide for more compact and sustainable development. Mass transit-oriented, walkable, bicycle-friendly land use, near existing development needs to be included in the reasonable range of alternatives, and selected as the preferred alternative in a revised EIR. Proposing Economic Opportunity Areas and Rural Town Areas in far-flung regions of the County where little County infrastructure including emergency services is in place and will be expensive to maintain, is an anathema to smart planning. A4-16

Segmentation of Centennial Review and Approval
The AVAP improperly approves a portion of the Centennial project without analyzing the whole of the project or reasonably foreseeable impacts. "Courts have considered separate activities as one CEQA project and required them to be reviewed together where, for example, the second activity is a reasonably foreseeable consequence of the activity." (*Sierra Club v. West Side Irrigation Dist.*, (2005) 128 Cal. App. 4th 690, 698 , see also *Bozung v. Local Agency Formation Com.*, 13 Cal. 3d 263 (1975)). The situation discussed in Sierra Club, is akin to the present situation because the County's change in zoning to approve a portion of the Centennial Project without analyzing the whole project runs afoul of CEQA. A4-17

VI. Desert Renewable Energy Conservation Plan

While the DEIR mentions the Desert Renewable Energy Conservation Plan (DRECP), it fails to address how the DAVAP relates to the DRECP. We recognize that the DAVAP was published prior to the DRECP, and we believe a revised DEIR is now necessary to incorporate an analysis of how the DAVAP and the DRECP align and how impacts from the DRECP will affect the Antelope Valley, based on the fact that a large Development Focus Area (DFA) is A4-18

14 http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_list.asp

6

proposed in the Antelope Valley[15]. While the DAVAP may have no impact on the DRECP, the DRECP may have a significant impact on the AVAP's resources and zoning. Therefore a fresh look at the impacts is requisite. A4-18 cont'd

VII. Public Open-Space Lands (Angeles NF, BLM, State and Local Park Lands)

The DEIR recognizes to a certain extent that land uses in and adjacent to existing open-space public lands including the Angeles National Forest, Bureau of Land Management (BLM) lands and State Park units have impact on these open space lands:

> "Policy COS 4.5: Require new development to provide adequate buffers from preserves, sanctuaries, habitat areas, wildlife corridors, State Parks, and National Forest lands."

EIR at 5.10-14

Policy COS 4.5 must also include BLM lands. The DEIR/DAVAP fails to identify "adequate buffer" size or adequately analyze the impacts to these existing public lands from such activities as construction and/or fire clearance. As with the SEAs, the zoning for properties adjacent to these public lands should be R20, 40 or 80 to prevent undue fragmentation and edge effects from occurring. A4-19

Conclusion

We urge the County to adopt land use, zoning and planning that encourages sustainable development while protecting our incredible diversity and natural heritage in Los Angeles County for future generations. Please feel free to contact me with any questions.

Respectfully submitted,

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Attachment 1. Exhibit 2 from Biota Report For the Centennial Specific Plan In Northwestern Antelope Valley Los Angeles County, California, Project Number 02-232, May 2008
Attachment 2. Exhibit 4 from Biota Report For the Centennial Specific Plan In Northwestern Antelope Valley Los Angeles County, California, Project Number 02-232, May 2008
Attachment 3: Center for Biological Diversity's Scoping Comments

15 http://www.drecp.org/draftdrecp/

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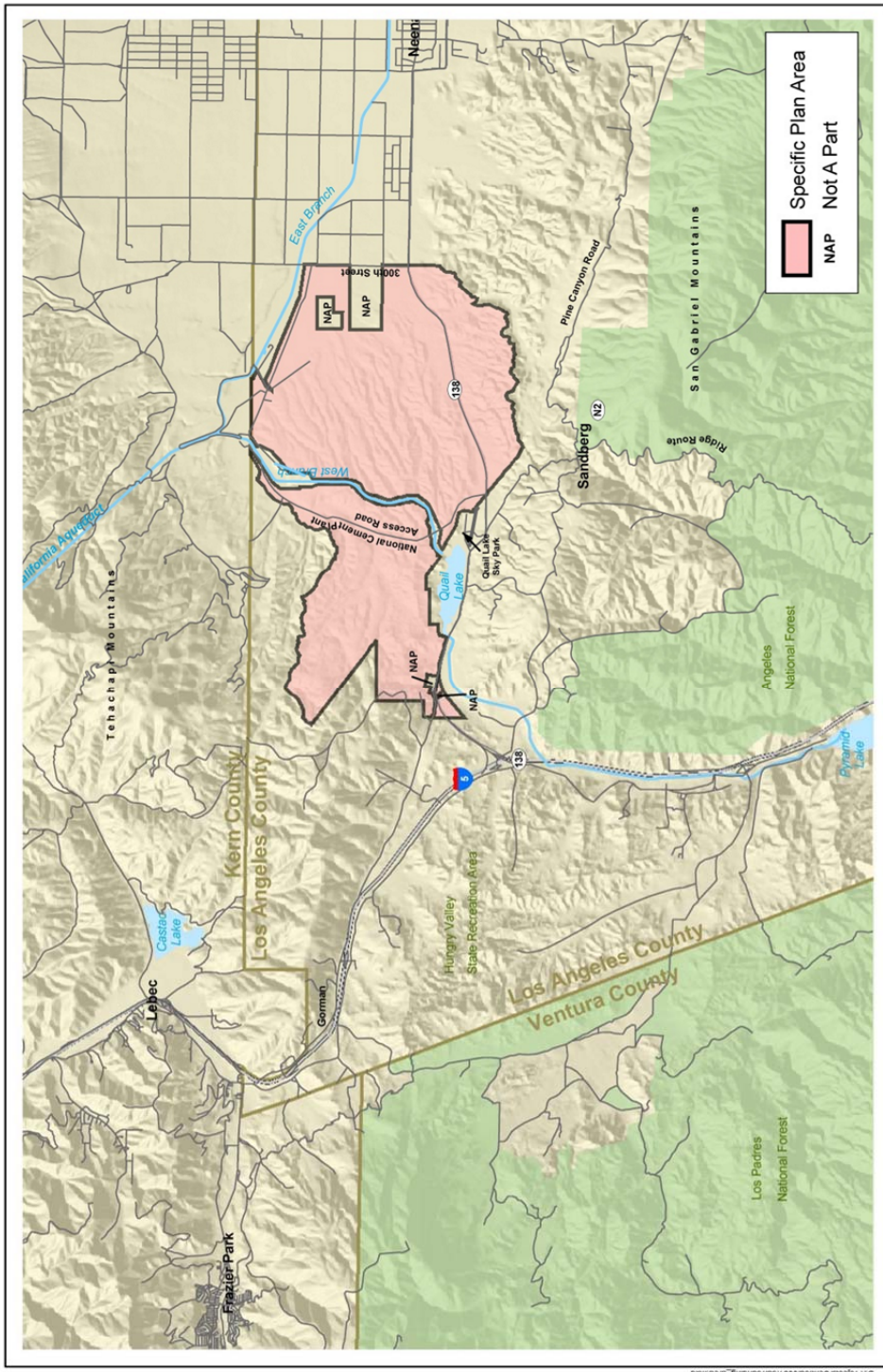
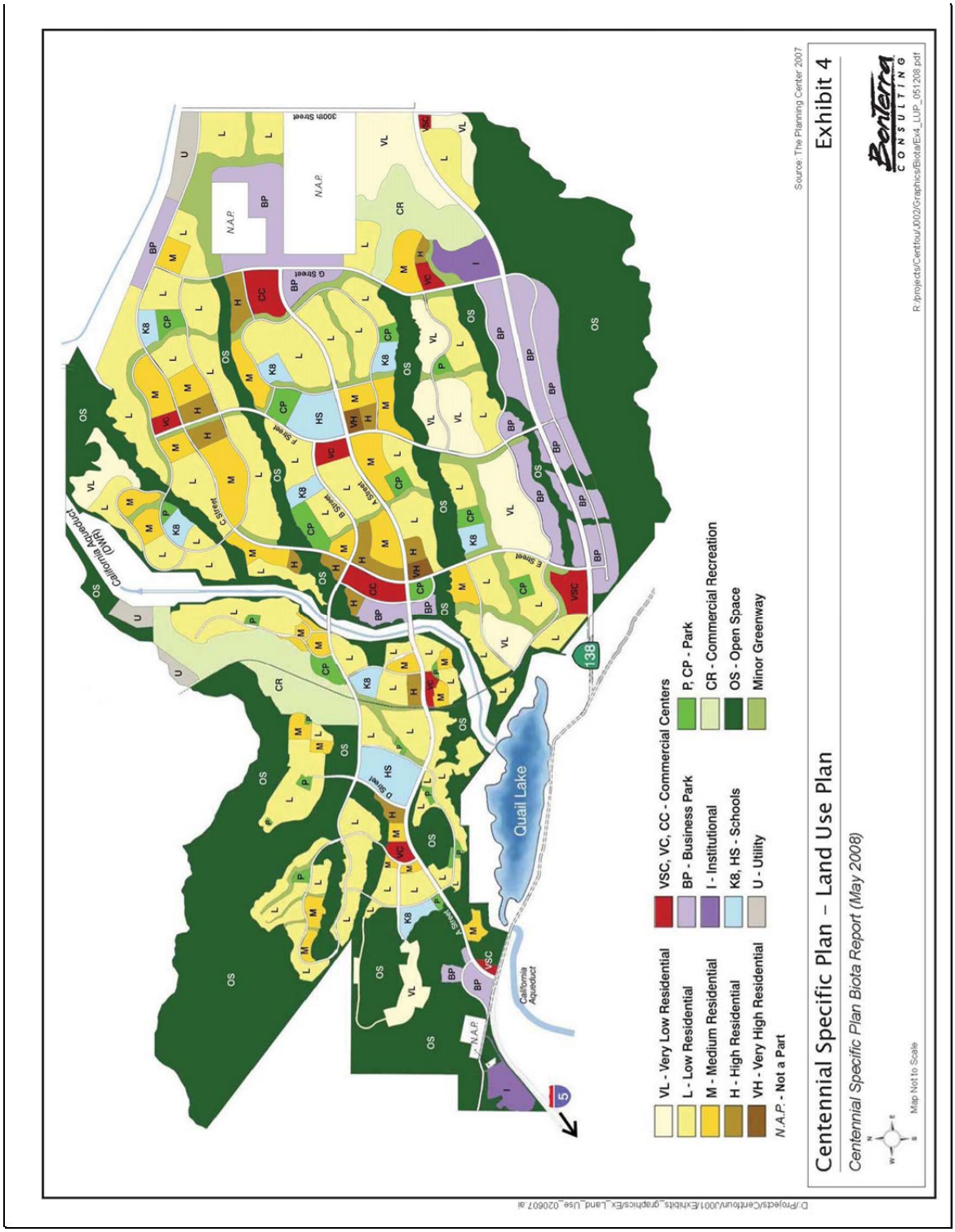
2. Response to Comments




Centennial Specific Plan – Land Use Plan
Centennial Specific Plan Biota Report (May 2008)
Map Not to Scale
VL - Very Low Residential
L - Low Residential
M - Medium Residential
H - High Residential
VH - Very High Residential
N.A.P. - Not a Part
VSC, VC, CC - Commercial Centers
BP - Business Park
I - Institutional
K8, HS - Schools
U - Utility
P, CP - Park
CR - Commercial Recreation
OS - Open Space
Minor Greenway
Source: The Planning Center 2007
Exhibit 4
BonTerra CONSULTING
R:/projects/Centfoun/J002/Graphics/Biota/Ex4_LUP_051208.pdf
Quail Lake
California Aqueduct
California Aqueduct (CWP)
300th Street
G Street
F Street
E Street
D Street
C Street
B Street
A Street
L Street
5
138
D:/Projects/Centfoun/J001/Exhibits_graphics/Ex_Land_Use_020607.ai

2. Response to Comments

CENTER for BIOLOGICAL DIVERSITY Because life is good.

protecting and restoring natural ecosystems and imperiled species through science, education, policy, and environmental law

7/11/2014

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RE: Comments on Notice of Preparation for the Los Angeles County Antelope Valley Areawide General Plan Update – June 12, 2014

Mr. Carl Nadela,

These comments are submitted on behalf of the Center for Biological Diversity (Center) regarding the Notice of Preparation for the Los Angeles County Antelope Valley Areawide General Plan Update dated June 12, 2014. At the Center for Biological Diversity, we believe that welfare of human beings is deeply linked to nature – to the existence in our world of vast diversity of wild animals and plants. Because diversity has intrinsic value, and because its loss impoverishes society, we work to secure a future for all species, great and small, hovering on the brink of extinction. We do so through science, law and creative media, with a focus on protecting lands, waters and climate that species need to survive. We want those that come after us to inherit a world where the wild is still alive. Many of our 775,000 staff, members and on-line activists in California and throughout the United States, live in, know and enjoy the biological diversity and world class landscape of northern Los Angeles County, including the Antelope Valley area.

Los Angeles County is a globally unique county which spans incredible topographic diversity – from the Pacific Ocean to Mount San Antonio (Mt. Baldy) at 10,068 feet and back down to the Mojave Desert. Because of the topographic diversity often coupled with significant development, many rare, threatened and endangered species occur within the County. While much of the coastal basin has been developed, the mountainous areas and desert areas remain ecologically intact and home to numerous rare species. The proposed Antelope Valley Areawide General Plan Update (AVAP) is a key document where the County has an opportunity to craft a plan that will indeed protect and sustain our world class natural heritage.

I. Inappropriate and Conflicting Land Use/Zoning Proposals

It appears that the AVAP includes the yet-to-be proposed Centennial project located in the western part of the Antelope Valley. The proposed land use designations of H5 – high density residential 5 (0-5 du / net ac), RL1 - Rural Land 1 (1 du/ gross ac) and IL – Light

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Industrial is in complete conflict with the surrounding land use designations of OS-C – Open Space Conservation, and RL 20, 10 and 2 – Rural Land 20 (1 du/20 gross ac), Rural Land 10 (1 du/10 gross ac) and Rural Land 2 (1 du/2 gross ac) respectively. In addition, the RL1 and IL and most all of the H5 are located in a Significant Ecological Area (SEA). While we recognize that some development of private lands are allowed in SEAs, certainly high density and industrial land use designations are inappropriate in SEAs. Interestingly and appropriately, **none** of the other SEA areas in the AVAP proposal have the extensive high development land use proposed within the boundary of the SEA. West of this area the document proposes CR – Commercial Rural designations in areas again that are proposed SEAs and surrounded by OS-C – Open Space Conservation, RL 20 - Rural Land 20 (1 du/20 gross ac) and OS-PR – Open Space Parks and Recreation. We urge the County to remove the H5, RL1, CR and IL designations and conform them to land use designations that are compatible with the SEA designation. The County need not create land use conflicts by layering incompatible land use designations in the same area.

To confuse matters further, the zoning maps show the yet-to-be-proposed Centennial project area as A-2-10, which is not clearly defined in the legend other than A-2 is heavy agriculture. At the current time, the land use appears to be primarily grazing, not crops. The zoning map also proposes MPD-PD - Manufacturing Industrial Planned Development (legend does not indicate what the –PD stands for), CR-U – Commercial Rural and CPD-DP - Commercial Planned Development (legend does not indicate what the –PD stands for here either) and is surrounded by O-S – Open Space and A-2 – Heavy agriculture. Again, the majority of the area is also within the boundaries of the SEA. To date, there have not been public proposals for commercial or industrial developments in this area that is highly significant for biological resources which need to be maintained as part of Los Angeles County's natural heritage. We urge the County to remove the MPD, CR-U and CPD designations and conform them to land use designations that are compatible with the SEA designation. The County need not create land use conflicts by layering incompatible land use designations in the same area.

Regarding the Rural Preservation Strategy map, the Rural Preserve Areas are defined as "largely undeveloped and generally not served by existing infrastructure and public facilities. Many of these areas contain environmental resources, such as Significant Ecological Areas, Scenic Resource Areas, and Agricultural Resource Areas" (Land Use Element at pg. 5). Virtually the whole of the yet-to-be-proposed Centennial project area and Gorman area are identified as Rural Preserve Areas. Proposing land use categories of HR5, RL1, CR and IL in these areas clearly undermines preserving rural areas and, as mentioned above, sets up conflicting designations. We urge the County to maintain the Rural Preserve Area designation and place more appropriate zoning and land use designations on these areas.

Additionally the Rural Preservation Strategy Map legend does not include all designations on the map. For example, cross hatching occurs in different areas of the map. If the cross-hatching represents Economic Opportunity Areas, this is clearly misplaced because a significant portion of the lands in the cross-hatched areas are identified as Rural Preserve Areas, which seems to conflict with Economic Opportunity Areas (EOAs). The NOP describes the EOAs as "areas where plans for major infrastructure projects are underway that would create conditions for development vastly different than currently existing on the ground." (NOP at pg

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2. Response to Comments

4). While we are aware of the highway projects, the County should not be encouraging sprawl development in remote areas of the County by altering land use and zoning in the AVAP (which basically covers all of the north Los Angeles County).

II. "Smart" Development

While the Center's focus is protecting rare and common species and their habitats, one key aspect to achieve habitat protection and ensure ecological sustainability is to avoid sprawl development. The County needs to concentrates growth in compact walkable urban centers and avoid sprawl. It also needs to plan compact, transit-oriented, walkable, bicycle-friendly land use, near existing development. Planning Economic Opportunity Areas and Rural Town Areas in far-flung regions of the County where little County infrastructure including emergency services is in place, and will be expensive to maintain is an anathema to smart planning.

III. Public Outreach

While the Introduction touts "highly inclusive and extensive community participation program", the Center did not become aware of this effort until mid-June of 2014, and only then through local contacts. We have worked with County planning staff on different projects in the past and specific to this project put in email and phone messages to the County Planning which remain unanswered. We have great interest in the County's planning and development activities and ask again to be put on the interested public list for projects. We also specifically ask to be put on the interested parties' list for the AVAP as it moves forward through the CEQA process.

IV. Conclusion

We urge the County to adopt land use, zoning and planning that encourages sustainable development while protecting our incredible diversity and natural heritage in Los Angeles County for future generations.

Respectfully submitted,

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A4. Response to comments from Ileene Anderson, Center for Biological Diversity, dated October 3, 2014.

A4-1 It should be noted that a RL-40 designation does not exist in the Adopted Area Plan. The Proposed Project substantially reduces development intensity within the proposed Significant Ecological Areas (SEAs) by converting most of the areas designated for residential development from N1 – Non Urban 1 (0.5 dwelling units/acre) and N2 – Non Urban 2 (1 dwelling unit/acre) to RL20 – Rural Land 20 (1 dwelling unit/20 acres). The use of the RL20 designation for the SEAs was a compromise reached with the Blue Ribbon Committee, and is an integral part of the balanced approach that the Proposed Area Plan achieves. This cannot be changed without affecting the overall integrity of the Proposed Area Plan. The County, as Lead Agency, determined that biological resources would be better protected through the expanded SEA boundaries and the RL20 designation included within the Proposed Project, rather than continued use of the N1 designation. Also, these areas are severely constrained by fault zones, seismic areas and Hillside Management Areas which further limiting potential development. The existing zoning code regulations that are currently in place, including the SEA Ordinance, will be able to regulate developments in these areas so that biological resources are adequately protected.

A4-2 One of the main objectives of the Proposed Project is to direct future development within the Project Area to three separate Economic Opportunity Areas (EOAs), while reducing allowable densities elsewhere and allowing for expansion of the existing SEA boundaries. The EOAs are proposed to focus development in areas near major infrastructure opportunities while preserving both open space and greater value habitat elsewhere. The land use designations within each EOA were developed to provide a balance between jobs and housing. Therefore, implementation of the Proposed Project allows for greater opportunities to preserve large, contiguous open space areas as compared to the Adopted Area Plan, which allows higher density development over a much larger area. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A4-3 The Los Angeles County Metropolitan Transportation Authority (Metro) and the California Department of Transportation (Caltrans) are studying various transportation projects in the North County area, including the Northwest 138 Corridor Improvement Project. Metro and Caltrans have initiated a new environmental study to evaluate the corridor alternatives. The project corridor traverses from Interstate 5 (I-5), just south of Gorman Post Road, to State Route 14 (SR-14) at West Avenue D (which is coterminous with SR-138). The West EOA was selected due to its proximity to major highways (the I-5 and SR-138), and employment opportunities in the Santa Clarita Valley located approximately 25 miles to the south. In addition, the proposed land use designations in the West EOA provide a balance between housing and jobs. As a result, the County has determined that creation of the West EOA is appropriate from a land use and

environmental perspective. Future master-planned development within the West EOA would be subject to further discretionary review and CEQA requirements, which will provide project-specific site design and environmental review.

A4-4 Please refer to Response A4-2 above.

A4-5 As discussed on Page 5.1-26 of the DEIR, designated Scenic Drives are located within EOAs. The Scenic Drive designation does not preclude development on adjacent lands. However, the Proposed Area Plan includes goals and policies that would protect scenic views along the designated corridors. In particular, implementation of Policy COS 5.7 would ensure that development standards and guidelines are established for development within the viewsheds of scenic drives. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A4-6 Although the West EOA does designate portions of the area for urban uses, a significant portion of the area is designated for open space as well as very low density residential uses (RL20), consistent with the Rural Preservation Strategy. An updated Rural Preservation Strategy Map also updates the H5 – Residential 5 (5 dwelling units/acre), RL1 – Rural Land 1 (1 dwelling unit/acre), CR (Rural Commercial) and IL (Light Industrial) areas as Rural Town Areas. Thus, this Proposed Area Plan directs growth to certain areas to help preserve other more environmentally sensitive areas.

A4-7 Seismic hazards related to the Proposed Project are discussed in Section 5.6 of the DEIR. As listed in Subsection 5.6.6 of the DEIR, all future development will be required to comply with the County Building Code, the County Grading Ordinance, and the Alquist-Priolo Earthquake Fault Zoning Act, regardless of the underlying land use designations. Therefore, no additional land use changes are necessary to comply with existing regulations relating to seismic hazards.

A4-8 The Fire Hazard Severity Zones are shown on Figure 5.8-1, *Fire Hazard Severity Zones*, of the DEIR. It clearly shows the Very High, High, and Moderate Fire Hazard Zones. The majority of these areas are designated Open Space or SEA in the Draft Area Plan. Please refer to Sections 5.8 and 5.14.1 of the DEIR for a complete discussion of fire hazards and fire protection.

A4-9 Comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A4-10 As discussed in Chapter 7 of the DEIR, three alternatives to the Proposed Project were analyzed in detail including the No Project/Existing Area Plan Alternative, Reduced Intensity Alternative, and the Alternative Land Use Policy Map. In addition, two alternatives were considered during the scoping process for the EIR including various Project Planning Alternatives, and the No Growth/No Development Alternative. As

discussed in Section 7.7 of the DEIR, the Reduced Intensity Alternative was selected as the Environmentally Superior Alternative. The County considers the five alternatives analyzed in the DEIR to be a "reasonable range" of alternatives which reduce the significant impacts of the project while attaining the basic objectives of the Proposed Project.

A4-11 Considering the size of the Project Area, which consists of over 1.1 million acres, it is not uncommon to have a substantial number of significant unavoidable adverse impacts. The Proposed Project consists of a Proposed Area Plan for northern Los Angeles County consisting of over 1,800 square miles. By contrast, the largest City in California by land area is the City of Los Angeles, at 503 square miles. The DEIR does identify eight significant unavoidable adverse impacts; however, this is related to the programmatic nature of the Proposed Project, which is a long-range planning document. All feasible mitigation measures for this level of planning have been incorporated into the Proposed Project. However, as future development projects are proposed, project-specific mitigation may be imposed to avoid or further reduce the significant impacts associated with buildout of the Project Area under the Proposed Project.

A4-12 Comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A4-13 Section 5.4.1.2 of the DEIR adequately describes the distribution and abundance of perennial grasses and wildflower fields in the Project Area. The DEIR identifies perennial grasslands and wildflower fields as sensitive plant communities, and states that the western part of the Antelope Valley and the ridgeline (the San Andreas rift zone) contain large areas of native perennial grasslands and wildflower fields (see also Figure 5.4-1, *Plant Communities of the Antelope Valley*, in the DEIR). The DEIR impact analysis concludes that implementation of the Proposed Project would significantly impact sensitive plant communities, including Valley needlegrass grassland (a perennial grassland) and wildflower fields.

The spatial data for the valley floor vegetation map were obtained from the California Department of Fish and Wildlife's (CDFW's) vegetation and mapping website[1]. These were developed by CDFW and others as part of the California Desert Vegetation Map in support of the Desert Renewable Energy Conservation Plan (DRECP), which combined native annual and perennial grasslands into one category. Separating native annual grasses and native perennial grasses in the DEIR vegetation map was not possible given that they were grouped in CDFW's data.

A4-14 The DEIR addresses impacts to sensitive plant communities that are known to occur in the Project Area. Wildflower fields are described in existing conditions section (5.4.1.2)

[1] http://www.dfg.ca.gov/biogeodata/vegcamp/

and identified as abundant in the western part of the Antelope Valley, mapped in Figure 5.4-1, *Plant Communities of the Antelope Valley*, and identified as a sensitive plant community that would be adversely impacted by buildout of the Project Area under the Proposed Project.

With regard to walnut woodland, this sensitive plant community may occur along slopes of the San Gabriel Mountains in the southern part of the Project Area. However, the U.S. Forest Service spatial data that was used for the Figure 5-4.2, *Plant Communities of the Angeles National Forest*, does not include this community in the Project Area[2]. With regard to coastal sage scrub, Section 5.4.1.2, *Existing Conditions* (page 5-4.11 of the DEIR) identifies the sage scrub plant communities in the Project Area, both the cismontane coastal sage scrub (Riversidian coastal sage scrub) and desert sage scrub (Riversidiandesert scrub). The lower cismontane slopes of the San Gabriel Mountains contain coastal sage scrub. With regard to marshes, the DEIR identifies the various seasonal wetlands and marshes that occur in the Project Area (page 5.4-11, 5.4-23-24; Figure 5.4-1, *Plant Communities of the Antelope Valley*). The impacts to these are addressed within Impact 5.4-3 (impacts to wetlands and jurisdictional waters; pages 5-4.83-84 of the DEIR). The names of the various wetland plant communities have been added to the list of sensitive plant communities in the Project Area summarized within the analysis under Impact 5.4-2 (page 5.4-80) of the DEIR:

> ***Impact Analysis***: The Project Area contains ~~16~~ 27 sensitive natural plant communities identified in the CNDDB, including canyon live oak ravine forest, Mojave riparian forest, Riversidean alluvial fan sage scrub, coastal sage scrub, walnut woodland,southern coast live oak riparian forest, southern cottonwood-willow riparian forest, southern mixed riparian forest, southern riparian forest, southern riparian scrub, southern sycamore alder riparian woodland, southern willow scrub, valley needlegrass grassland, valley oak woodland, wildflower field, vernal pool, Southern California arroyo chub/Santa Ana sucker stream, ~~and~~ Southern California threespine stickleback stream, and nine seasonal wetland and marsh plant communities (freshwater marsh, alkali meadow, alkali marsh, alkali sink scrub, alkali playas, freshwater seeps, vernal pools, ephemeral ponds, and montane meadows). Several of the sensitive woodland plant communities occur primarily in the mountainous parts of the Project Area, which are under the jurisdiction of the Angeles and Los Padres national forests. Development (residential, commercial, industrial, and public/institutional) that would occur under the Proposed Project would occur primarily in the Antelope Valley, and to a much smaller extent in the San Gabriel Mountains part of the Project Area. The Proposed Project would allow low density residential development on private in-holdings within the national forests (typically one dwelling unit per 10 acres) and limited commercial/recreational

[2] http://www.fs.usda.gov/detail/r5/landmanagement/resourcemanagement/?cid=stelprdb5347192

development. The Proposed Area Plan would not affect land use within Edwards Air Force Base.

A4-15 All feasible mitigation measures for this level of planning have been incorporated into the Proposed Project. However, as future development projects are proposed, project-specific mitigation may be imposed to avoid or further reduce the potentially significant biological impacts of buildout of the Project Area under the Proposed Project. In addition, compliance with the SEA requirements is designed to protect the significant biological resources present within the County, including the Antelope Valley. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A4-16 Please refer to Response A4-2 above.

A4-17 CEQA requires an EIR to consider "the whole of an action" which is proposed for approval, and cannot piecemeal or segment a project to avoid environmental review. The Proposed Project consists of a comprehensive update to the Proposed Area Plan, which provides the general land use designations for the Project Area. The Project Proponent for the Proposed Project is the County. While the Centennial project is located within the Proposed Area Plan, no project-level entitlements will be granted if the Proposed Area Plan is adopted. Any development proposed by the Centennial project will require separate development applications by the landowner/developer, project-level approvals including a specific plan or similar planning document, tract maps, and a project-level EIR. Therefore, the Proposed Area Plan and the Centennial project are separate projects with independent utility, and no impermissible segmentation has occurred.

However, it should be noted that any future development projects within the Project Area including Centennial, may tier off of the Program EIR for the Proposed Project to the extent permitted by CEQA. "Tiering" refers "to the coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared. Tiering is appropriate when the sequence of EIRS is: [¶] (a) From a general plan, policy, or program EIR to a . . . site-specific EIR." (CEQA Guidelines, § 15385, italics added.)

The Legislature encourages tiering of EIRs where applicable. "(a) The Legislature finds and declares that tiering of environmental impact reports will promote construction of needed housing and other development projects by (1) streamlining regulatory procedures, (2) avoiding repetitive discussions of the same issues in successive environmental impact reports, and (3) ensuring that environmental impact reports prepared for later projects which are consistent with a previously approved policy, plan, program, or ordinance concentrate upon environmental effects which may be mitigated

or avoided in connection with the decision on each later project. The Legislature further finds and declares that tiering is appropriate when it helps a public agency to focus upon the issues ripe for decision at each level of environmental review and in order to exclude duplicative analysis of environmental effects examined in previous environmental impact reports. " (CEQA § 21093.)

A4-18 The Draft DRECP is a landscape-scale plan that uses science to inform the siting of renewable energy development projects and the conservation of species, creating systematic habitat protection and connectivity improvements across the Mojave and Colorado/Sonoran desert regions. The Draft DRECP's comprehensive approach is more transparent and predictable and would achieve conservation benefits that could not be achieved using the project-by-project approach currently used to permit renewable energy projects and protect species. The Draft DRECP considers renewable energy facility development in the desert over the next 25 years and, through strategic habitat conservation, provides an ecosystem approach to impact mitigation and landscape-level natural resources conservation. The environmental impacts of the DRECP are addressed in the associated Draft EIR/Environmental Impact Statement (EIS).

While the Proposed Area Plan addresses issues related to renewable energy through various goals and policies, it does not designate specific locations for future renewable energy projects. However, renewable energy projects are allowed within various industrial and rural designations in the Proposed Area Plan. Therefore, the potential for renewable energy projects within the Project Area is addressed in the DEIR to the extent feasible at this level of planning.

A4-19 Though not related to the DEIR, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

LETTER A5 –Tri-County Watchdogs(10 pages)

Tri-County Watchdogs
15616 Mil Potrero, Box 6413
Pine Mountain Club, CA 93222

October 5, 2014

SENT VIA EMAIL

Mr. Carl Nadela, AICP
Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA90012
Email: tnc@planning.lacounty.gov

Dear Mr. Nadela and the Los Angeles County Board of Supervisors:

The Tri-County Watchdogs are an environmental organization whose members live in the three counties of Los Angeles, Kern, and Ventura, and whose mission is to protect natural and cultural resources, and promote ecotourism and responsible growth. Our activities are focused on the Frazier Mountain Communities area near the Grapevine Pass that connects the San Joaquin Valley and northern California to Southern California.

We begin our comments on the updated Antelope Valley Areawide Plan DEIR by stating our strong objection to the brief 45-day comment period that was given us to review approximately 2406 pages of documents. We regret that the Supervisors' apparent desire to move forward quickly on the AVAP projects led you to deny our request for a 60-day extension to the comment period.

An extension of the comment period would have been especially useful given that on September 27 the proposed boundaries of the **San Andreas Significant Ecological Area** (SEA 21) were suddenly changed to accommodate developers' plans, specifically those of Tejon Ranch for its huge Centennial Development. How do these changes affect the DEIR's assessment of negative impacts? We have not had time to find out. A5-1

We live adjacent to the proposed Centennial development. We are concerned that the Significant Ecological Area Technical Advisory Committee recommended pro-developer changes to the SEA 21 without any review that we are aware of. The high density residential development and new commercial and industrial uses where none now exist requires a high degree of scrutiny before L.A. County Supervisors agree to backpedal on the original proposed SEA extension. We insist that a report detailing the impact of these land use on a curtailed SEA 21 be prepared in a timely fashion and be made publicly available for comment before the Los Angeles County Board of Supervisors votes to approve or disapprove the DEIR. A5-2

2. Response to Comments

In addition, the DEIR makes many assumptions about the SEA areas. We believe that the areas that are in, or next to, an SEA should not be included in any zoning designations until the SEA changes are publicly vetted in an EIR and a CEQUA review. A5-2 cont'd

We offer the following comments on the specific areas of the DEIR that we have had time to study.

Aesthetics, 5.01

Wildflower displays

Although Policy ED 1.16 directs to "Preserve the scenic resources of the Antelope Valley, including Scenic Drives, Significant Ridgelines and Significant Ecological Areas, in such a way that can contribute to the economic activities in the area," we did not see any mention of the seasonal wildflowers in Chapter 5.01 of the DEIR. Poppies and wildflower fields are visible not just in the Poppy Preserve but throughout the Antelope Valley in the springtime. Route 5 from Castaic to Grapevine is full of beautiful and scenic views, which change throughout the year. These vistas include the splendor of wildflower displays and snowy peaks, where complex ecological relationships are the subject of scientific study as well as aesthetic enjoyment. These tourist-drawing vistas should be cherished and not allowed to disappear. A5-3

We find it unfortunate that only a small portion of our local Highways are included in the California Scenic Highway Program. We would point to Route 138, especially between Interstate-5 and Neenach, as a special stretch of highway to be made eligible for this program.

The Tri-County Watchdogs would like to partner with interested groups and area property holders in making this happen, but the Economic Opportunity Areas along the 138 may make this impossible.

Glare
There is a Dark Skies ordinance in Los Angeles County that covers new construction. What is needed is a method to enforce these ordinances through a county agency. In light of the extensive build-out proposed in the AVAP, a build-out that will cause many significant irreversible changes and unavoidable adverses impacts, existing violations also need to be addressed. A5-4

Ecotourism
Tourism (ecotourism,) our most viable creator of future jobs and prosperity in the surrounding area will be negatively impacted by the visual blight of a Castaic type sprawl in the Antelope Valley. A5-5

MITIGATIONS:

1. Include Route 138, especially between Interstate-5 and Neenach, in the California Scenic Highway Program.

2. Developers should pay into a fund that will be used to mitigate light pollution in the plan area.
3. Include enforcement mechanism in the DEIR.
4.
4. Establish a fund to offset the loss of tourism dollars to the local communities.

A5-5 cont'd

Air Quality, 5.3

It is clear from the discussions on 5.3-3-9 [Air Pollutants of Concern], 5.3-30-38 [Impact 5.3-3] and 5.3-41-2 [Level of Significance after Mitigation] that during construction and after build-out of the proposed project, levels of air pollution would rise to unacceptable levels, causing illness, disability and premature death to the inhabitants of the Antelope Valley. As the DEIR states, no mitigation exists that can bring to levels required by the South Coast Air Quality Management District and the Antelope Valley Air Quality Management District the daily emissions of VOC [Volatile Organic Compounds that lead to the formation of ozone, which triggers chest pain, coughing, throat irritation, and congestion, worsens bronchitis, emphysema, and asthma, and can inflame the linings of the lungs and even, with repeated exposure permanently scar lung tissue], NOX [Nitrogen Oxides that cause airway inflammation and increase asthma], CO [Carbon Monoxide, which deprives tissues of oxygen], SO2 [Sulfur Dioxide, which causes increased asthma symptoms and damages lung tissue], PM10 and PM2.5 [inhalable coarse and fine Particulate Matter that aggravate asthma, cause heart attacks and decreased lung function, cause premature death in people with weakened hearts or lungs].

Although no mitigation will solve the air pollution risks during and after build-out, we recommend as essential mitigations the following requirements for both existing communities and new developments within the project area.

A5-6

MITIGATIONS:

1. To stimulate non-automobile forms of transportation:

A. Bicycle paths separated from traffic must be created

B. Bicycle parking space and lockers must be provided at non-residential buildings (as in the DEIR).

C. Free air pumps just for bicycles must be made available by all gas stations

D. Every lot should be required to plant trees near the sidewalks so that a canopy can be created for walking and bicycling.

E Bus stops must have ample shelters and seating areas.

.F Keep shopping-mall parking lots small, but place spacious bus shelters near entrances.

. G Do not permit gated communities with limited access to make walking and biking routes. longer.

H Development plans must include walkable shopping for all residential areas.

I Create and enforce strong leash rules so people feel safe walking around the neighborhood

2. To diminish pollutants and greenhouse gases:

2. Response to Comments

A. Builders must install solar panels over parking lots, office buildings and on all homes (as in the DEIR).
B. Builders must landscape with minimal lawn areas and low-water-use planting
C. Builders must install separated grey water (sink, shower, washing machine) systems from sewer water systems
D Require convenient electric vehicle charging stations in all commercial and industrial area parking lots (as in the DEIR, but specify 10 stations per 100,000 square foot building).
E Ensure access to all parts of a community by slower electric vehicles such as golf carts
F Require electrified truck stop(s)
G Developers and communities must provide incentives and space for car pooling
H Ensure bus service on weekends to popular destinations within 100 miles.
I Developers must set aside lots for community garden space based on the number of proposed residents (bedrooms in units), for example one lot out of every 20.
J Permanent preserves or buffer zones for natural land preservation should be created via a compensatory mitigation ratio 2:1 of new development area.

A5-6 cont'd

Biological Resources, 5.4

The Antelope Valley plan area is an area of major biological region interaction. The Transverse mountain ranges, and Coast mountains, the Mojave desert, the San Joaquin Valley and the southern end of the sierra Nevada Mountains in the form of the Tehachapis all intersect within or very near this region. This is the greatest intersection of bioregions in the state of California. A Natural History of California by Allan A. Schoenherr, 1992 will confirm this statement. The DEIR mentions the plan's effect on biological corridors or habitat connectivity, saying that buildout will impact them adversely. We hope that the Board of Supervisors will make this issue a priority both in their voting on the plan and in the EIRs required for all building permits in the future.

Sensitive Plants There are tables of sensitive plant resources in this document that appear to be compiled from public sources (CNDDB or CCH); all of the special status plant species that were previously observed on Centennial are on these lists. The lists mention at least one plant that was never documented on Centennial, but has been documented recently (2013) in the Gorman Hills, so that information came from a public source (CCH). The document provides for further review of impacts to biological resources on a project basis; however, it is not clear how far that review would be required to go. Would each project need to address cumulative impacts for losses of specials status species beyond this project level? Would an EIR for each project be required? This needs clarification.

A5-7

Sensitive Plant Communities Impacts to special status species (plants and animals) are considered significant and unavoidable in this document; however, impacts to special status plant communities are not considered significant (or not considered at all…they are merely mentioned in the document.) Special status plant communities seem to be lumped in with wetlands. Mitigation is provided to replace the loss of jurisdiction wetlands, but not for plant communities that are considered special status, like native grasslands or wildflower fields. Impacts to native

grasslands must be considered significant, both directly and on a cumulative basis. (Where are the Centennial vegetation maps that show native grasslands?)

Wildlife Corridors Direct and cumulative impacts to species and wildlife corridors are considered significant and unavoidable in this document.

A5-7 cont'd

MITIGATIONS:

1. At a minimum, adopt an enlarged SEA with the original proposed boundaries before the Planning Department diminished them on Sept 27, 2014.
2. Create mitigation for the native grasslands and wildflower fields.
3. Require cumulative impact studies for losses of special status species beyond the project level.

Seismic Impact, 5.6

Reviewing the Geology and Soils section of the Draft Environmental Impact Report, there are a number of issues that must be addressed before the EIR is approved and projects are permitted.

1. There are a number of policies stated that are in direct conflict with the development methods outlined in and covered by the AVAP. Under the land use policies, policy LU 3.1 prohibits new development on fault traces and limits potential development in seismic zones, through appropriate land use designations with very low residential densities.

   Under public safety policies, policy PS 2.1 limits the amount of potential development specifically along the San Andreas Fault, again stressing the use of very low density land use designations. These policies are blatantly in conflict with the zoning present in the Centennial development area, which is zoned H5 Residential and located directly adjacent to the San Andreas Fault line, a fault characterized in the report itself by stating "it may represent the single most significant earthquake fault zone in California". A5-8

   How can a development with 5 domestic units per acre possibly qualify as "very low residential density"? We urge you to put the safety of potential residents above the desires for residential density, take your own advice, and follow the policies and guidelines clearly stated in the DEIR.

2. The results of the liquefaction section in section 5.6.4 are contradictory. In the first paragraph it is stated that "the Proposed Project could subject persons or structures to potentially significant hazards arising from liquefaction." In the very next paragraph though, it is stated that "the Proposed Project would not result in increased risk of or exposure to liquefaction". It is impossible that increased development will not result in increased risk, as by definition, increasing the density of population throughout these areas prone to liquefaction will submit more people and structures to increased risk and hazards. A5-9

2. Response to Comments

This section clearly needs to be reviewed again and hazards taken more seriously, completed with the prudence necessary to ensure safety and a care for human life. A5-9 cont'd

3. This disregard for safety is echoed as well in the Strong Seismic Ground Shaking section, section (5.6.4), where it is stated that "the Project Area is not at a greater risk of seismic activity or impacts than other areas" of Southern California. There are no facts or studies cited to provide a reasonable basis for this statement, and it is an absurd assumption that belies a blatant disregard for safety and a negligence that if unchecked, would be a very reasonable grounds for legal action. A5-10

All responsibility for these risks is passed off to County building regulations and codes, assuming without any due diligence that these codes, and the independent calculations done in geotechnical investigations are sufficient to protect residents from the hazards that this plan puts them in by locating concentrated development directly adjacent to the San Andreas Fault. This is clearly stated in the report in section 5.6.5 Cumulative Impacts, where it states "buildout would expose a greater number of people to seismic hazards". This is again passed off to County Building Codes, assuming that the codes and regulations would mitigate the hazards present, without any analysis or facts to support that assumption. Or that the County can assume the extra burden of enforcing these codes.

The disregard for safety and carefree assumption of mitigation of hazards without any supporting evidence are, to say the least, extremely unsettling. Much more realistic analysis of the specific hazards and suitability of building codes to areas directly adjacent to the San Andreas Fault line is needed to ensure that human lives are not put at risk due to planned development and development densities. Existing policies should studied and followed prudently, rather than disregarded completely as they have been in this report and proposed plan.

Due to this astounding negligence and professional incompetence, the following steps must be taken to remedy the situation: A5-11

MITIGATIONS

1. Zoning and location of planned developments must be changed to follow the policies cited above
2. A legitimate liquefaction study must be conducted in the proposed areas, with scientifically supported conclusion of mitigated hazards and low risk
3. A geological study done by a state-certified professional engineer must be made available for review, with data and calculations supporting the stance that building a 5 DU per acre development directly adjacent to the San Andreas Fault is not a significant risk
4. The Department of Regional Planning must take responsibility for the risks it is putting proposed future residents in, by taking appropriate safety measures in accordance with the conclusions of the geological study done by a state-certified professional engineer

Cultural and Historical Resources, 5.5

According to the DEIR, buildout of the Proposed Project could destroy historic, archaeological or paleontological resources or a unique geologic features (5.5.-1). While entities and codes exist to protect artifacts that may be discovered during construction, we ask for increased monitoring and enforcement mechanisms so that no artifacts may be ignored. A5-12

Hydrology and Water Quality, 5.9

This issue is not adequately addressed in the DEIR.

In a time of climate change and projected future water source limitations, very little is mentioned about water sources for allowed projects. This is a huge lack in the DEIR. The environmental review of the Kern Water Bank has been struck down recently, saying state regulators didn't do enough in 2010 to examine how its operation affects the state's water resources and wildlife. A new DEIR of the Kern Water Bank may throw Tejon Ranch Corporation's assurance that there is water to fund Centennial City—at least for twenty years—into doubt. Those of us who live in little towns adjacent already know there isn't enough water for a new city. For example,

1. The State Water Project is only allocating 5% to all water contractors, including the Antelope Valley.

2. Ground water is very elusive because [illegible] only a 5% recharge of rainwater percolating into the aquifer and that's only if the [illegible] has not collapsed. What will happen to sensitive habitat as well as humans if groundwater continues to disappear at its current rate. [see http://www.water.ca.gov/waterconditions/docs/Drought_Response-Groundwater_Basins_April30_Final_BC.pdf]. A5-13

The DEIR relies on a forecast that "groundwater resources combined with existing and new imported SWP water, surface water, and recycled water supplies will be sufficient to meet the population needs of the AV including the project area through the year 2035" (5.9-27). Reclamation is claimed as a major source of water, but there is no plan for this. Exactly how is the Antelope Valley going to clean water into an unadulterated state so it can be consumed? Do the studies the forecast relies on take into account the expected big earthquake on the San Anreas Fault? When it happens, water sources could well be altered.

In addition, the Antelope Valley does not appear to have an infrastructure for flooding, although it is a flood zone. Increased development will make such infrastructure all the more important.

Because of the significant and irreversible changes due to the proposed project the current supply of water will not be adequate for any residential development of the scope of the Centennial Project. This issue must be more fully addressed in the final EIR .

2. Response to Comments

MITIGATIONS:
1. No projects be permitted until a groundwater management plan is in place. This plan should include reclamation as well as potential effects of natural disasters.
2. No project be permitted until it proves there is a 50 - year water supply for the proposed and all current developments.

A5-13 cont'd

Public Services, 5.14

The DEIR does not address an important public services issue of fighting fire along the I-5 and the 138. As the Antelope Valley develops with increased traffic, there will undoubtedly be increased fires started by cars – especially since there will be more idling time as cars travel up the I-5. With increased population, the freeway will most likely move into a grade F scale. Increased fires will not only put lives and property, in the entire region and beyond at risk by fire alone, the smoke fires will create will produce huge amounts of particulate matter into the air and cause short and long term health issues to people living or traveling through the region.

A5-14

Please address this issue in the final EIR, and consider the following mitigations.

MITIGATIONS

1. Designate extra freeway funds to increase I-5s capacity and maintenance..
2. Build fire extinguishes stations along the freeway.
3. Increase public transportation for people traveling to & though the grapevine to reduce traffic therefore reducing chance of fires.
4.

Transportation and Traffic, 5.16

According to the Draft Environmental Impact Report made available to the public, the levels of service for areas East of Highway 14 already exceed current capacity in some areas, and will only be exacerbated by planned development. However, routes and intersections West of Highway 14 were not studied at all in this traffic analysis. This is unacceptable, specifically as the plan includes areas around the planned Centennial housing development, near Quail Lake. Due to this lack of information, we urge you to halt the plans of development until adequate environmental impact studies are done in that area, or remove that area from the Antelope Valley Area Plan (AVAP), requiring a separate and thorough impact analysis to be done for the areas surrounding Gorman and Neenach.

A5-15

The traffic impact needs to be studied and addressed before developments plans continue. The proposed development will add a significant number of commercial and commuter car trips in this completely undeveloped area. A key traffic impact not covered in the report is the impact on the I-5 Freeway and Highway 138. No serious consideration was given to these main thoroughfares for the region, with an unstated assumption that no impact would occur. This assumption is unfounded and puts the validity of the entire DEIR at risk, showing a severe lack of due diligence being done for the plan.

The current road capacities East of Highway 14, as stated in the report, cannot withstand the planned development, with increased levels of traffic anywhere from 20-100%, bringing the level of service to many areas to an E or F rating. Notably, Fort Tejon Road, multiple streets West of Lancaster, and many areas of the Pearlblossom Highway (138) have predicted traffic levels that would make these areas severely congested, limiting economic growth and causing added air pollution. All responsibility for buildout to suit these changes in traffic levels has been placed on the State and CalTrans, with no effort being put forth whatsoever to ensure a reasonable traffic plan is enacted for the planned development.

Every section of this report focuses solely on enabling rapid non-rural development at the cost of every single goal put forth by the community and the AVAP itself. Because of this, if this plan is to go forward, we call for the following mitigatioNs: A5-16

MITIGATIONS

1. A detailed traffic impact study for development plans in the economic opportunity area between Gorman and Neenach
2. Responsibility be taken and funding found for the impacts of traffic increases in all areas
3. A balanced and well-researched plan be designed that plans for:
   a. Public transportation be made available in accordance to the guidance of the AVAP
   b. Bike paths be numerous and available for safe transportation in line with the policies in the AVAP
   c. Electric car charging stations be planned for in accordance with the AVAP's guidelines.

Furthermore, concerning the new **Economic Improvement Areas,** we ask for more specifics: what sort of businesses will these be (we imagine strip malls and warehouses draining away the livelihood of current local businesses and doing nothing to establish a more robust economy); what tax advantages will they enjoy; what sort of footprint will they have; a consideration of aesthetic standards and a study of the impact they will have on local businesses. A5-17

In summary, The Tri-County Watchdogs are concerned that the Los Angeles Board of Supervisors is not taking as seriously as they should the environmental impact of the proposed land use changes and projects within the updated AVAP.

1) Tejon's Centennial Project <u>definitely</u> needs to have its own entirely separate EIR. The scope of the project is too massive and novel, and its impact on the surrounding area too intrusive to subsume in this document.
2) This DEIR identifies a tremendous amount of urban/suburban sprawl which will negatively affect many forms of infrastructure accommodations for future allowed individual projects. A5-18
3) The aesthetic character and air quality of the western Antelope Valley will be completely altered –not for the better--by the Plan Update, particularly by the Centennial Project.

We ask that instead of leap-frogging to establish new commercial and residential areas, that a policy of infill be considered, directing these changes to areas where infrastructure is already in place, thus preserving the rural character of the land where "roads, fences, and homes are

2. Response to Comments

designed to be modest and utilitarian" (p. 5.1-10). And please, before the LAC BOS approves anything, make sure that there is long-term water available that will not deplete supplies for neighboring communities. (We do not consider private hauling to be such a long term supply.) A5-18 cont'd

Thank you in advance for your careful consideration of our concerns.

Sincerely yours,

Katherine King
Secretary, Tri-County Watchdogs

A5. Response to comments from Katherine King, Tri-County Watchdogs, dated October 5, 2014.

A5-1 When submitted to the State Clearinghouse for review by state agencies, the review period for an EIR must not be less than 45 days, unless the State Clearinghouse grants a shorter period of not less than 30 days (CEQA Guidelines §15105). A longer public review period is not required by CEQA. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

The Proposed Project analyzed in the DEIR was the August 2014 version of the Proposed Area Plan, including the SEA boundaries proposed at that time.

A5-2 In 2000, the County commissioned the Los Angeles County Significant Ecological Area Update Study (2000 Update Study), which was subsequently released for public review. Conservation planning was a fundamental aspect of this Study, which was designed to accomplish the following: evaluate existing SEAs for changes in biotic conditions and consider additional areas for SEA status; propose SEA boundaries based upon biotic evaluation; and propose guidelines for managing and conserving biological resources within SEAs. The 2000 Update Study was based on scientifically grounded concepts regarding the size and type of linkage systems necessary to sustain the biologically diverse plant and animal species that are found within the County. All recommended SEAs in the SEA Update Study were evaluated and refined between 2001 and 2002 after consideration of public and resource agency input.

In 2005, the proposed SEAs were again refined, based on the SEA criteria, to address public comment received in 2003 and 2004. Additional field work was conducted, literature review and sensitive species data tables updated, and a subset of the SEAs, called Ecological Transition Areas, identified and mapped. At the end of this process, the County's staff biologists and environmental consultants convened to review the updated SEA boundaries over aerial photography to ensure mapping accuracy. The meeting resulted in all four biologists concurring that the proposed boundaries met the SEA criteria. These refinements were reflected on the draft SEA Map, released for public review as part of the draft General Plan in 2007.

In 2011, the draft SEA Map was released for public review as part of the Los Angeles County Draft 2035 General Plan. Throughout the entirety of the SEA Study and update process, modifications to the proposed boundaries have occurred with careful and deliberate consideration of the adjustments' effect on the continued viability of the entire SEA. The County proposes to expand SEAs and create three new ones in the Project Area as part of the Proposed Project. Under the Proposed Project, the SEA coverage in Project Area would be expanded from 135,772 to 332,899 total acres, providing substantially greater protection of biological resources. Three new SEAs would be created in the southern San Gabriel Mountain area in the southern part of the

Project Area. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A5-3 Please refer to Section 5.1, *Aesthetics*, for a discussion of the visual impacts of the Proposed Project. Although the State Scenic Highways program is a State program, the County has designated SR-138 as a Scenic Drive in the Proposed Area Plan.

A5-4 All future development within the Project Area will be required to comply with all existing County codes and ordinances, including the Rural Outdoor Lighting District ("Dark Skies") ordinance. Although not related to the Proposed Project, existing code violations should be reported to the County for enforcement.

A5-5 One of the main objectives of the Proposed Project is to direct future development within the Project Area to three separate Economic Opportunity Areas (EOAs), while reducing allowable densities elsewhere and allowing for expansion of the existing SEA boundaries. The EOAs are proposed to focus development in areas near major infrastructure opportunities while preserving both open space and greater value habitat elsewhere. The land use designations within each EOA were developed to provide a balance between jobs and housing. Therefore, implementation of the Proposed Project allows for greater opportunities to preserve large, contiguous open space areas as compared to the Adopted Area Plan, which allows higher density development over a much larger area. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

As discussed in Section 5.1 of the DEIR, aesthetic impacts were not determined to be significant provided future projects comply with existing County regulations and the goals and policies included in the Proposed Area Plan. As a result, these additional mitigation measures, as suggested by the commenter, are not necessary.

A5-6 The Commenter provided additional mitigation measures to be considered for incorporation into the DEIR. Per the Commenter recommendation, Mitigation Measure GHG-2 has been revised to include some of the measures suggested. The change has been incorporated into Section 3.2, *DEIR Revisions in Response to Written Comments*, of this FEIR as shown below. The other remaining measures suggested by the Commenter were considered, but were not incorporated as additional mitigation measures in the DEIR as they are either beyond the control of the County, are within the purview of the proposed policies of the Proposed Area Plan, are covered under a current mitigation measure or existing regulation (e.g., County Building Code or Tree Planting Ordinance), or would not provide measurable reductions in air quality and greenhouse gas emissions.

GHG-2 The County of Los Angeles shall include the following additional implementation actions in the Antelope Valley Area Plan Implementation Plan (Chapter 8) to ensure progress toward meeting the long-term GHG reduction goals of Executive Order S-03-05:

The County shall further research to determine the feasibility, and as appropriate propose amendments to the County Code, for the following:

- Prior to issuance of building permits for new construction of residential development, the property owner/developer shall indicate on plans that garage and/or car port parking are electrically wired to accommodate a Level 2 (240 volt) EV charging. The location of the electrical outlets shall be specified on building plans, and proper installation shall be verified by Department of Public Works prior to issuance of a Certificate of Occupancy.
- Prior to issuance of building permits for new construction of non-residential development of 100,000 building square feet or more within the Antelope Valley Area Plan, the applicant shall indicate on plans that at minimum, 10 Level 2 EV vehicle charging stations will be provided for public use. The location of the EV station(s) shall be specified on building plans, and proper installation shall be verified by the Department of Public Works prior to issuance of a Certificate of Occupancy.
- The County of Los Angeles shall require applicants of new residential developments to consider installation of gray water systems for resident use.
- The County of Los Angeles shall require applicants of non-residential developments of 100,000 building square feet or more, to coordinate with the Antelope Valley Transit Authority for the installation of additional bus shelters and transit stops as feasible.

A5-7 The list and occurrence for sensitive plants is based on all available information, including the California Natural Diversity Database (CNDDB), California Critical Habitat (CCH), and biological assessments in the region. Mitigation Measure BIO-1 (page 5-4.89 of the DEIR) requires that projects that impact biological resources include an analysis of impacts based on a general survey and focused surveys for sensitive plants and animals as needed. Project-specific EIRs do contain an analysis of cumulative impacts that would cover biological resources if it is one of the topics addressed by the DEIR.

The DEIR identifies 16 sensitive natural plant communities in the Project Area (page 5.4-80) and concludes that buildout of the Proposed Project would result in significant adverse effect on sensitive communities (page 5.4-83). See also Response to Comment A5-14. The impacts to perennial grasslands and wildflower fields are among those considered significantly adverse. For additional information on perennial grasslands,

wildflower fields, and the source of data for Figure 5.4-1 of the DEIR, *Plant Communities of the Antelope Valley*.

A5-8 As described in the Section 5.6 of the DEIR, the San Andreas Fault Zone is located adjacent to the West EOA. In accordance with the Alquist-Priolo Earthquake Fault Zoning Act, new construction of houses within these zones is prohibited unless a comprehensive geologic investigation shows that the fault does not pose a hazard to the proposed structure. In addition, all structures will be required by comply with the County Building Code. Therefore, no significant impacts related to geology and soils are anticipated.

A5-9 As discussed on Page 5.6-18 of the DEIR, although liquefaction zones have been mapped within the Project Area, future development associated with buildout of the Project Area allowed by the Proposed Project would not result in increased risk of or exposure to liquefaction or other seismic-related ground failures. Geotechnical investigations for future development plans considered for approval by the County pursuant to the Proposed Project would be required to evaluate the potential for liquefaction and other seismic ground failure, such as lateral spreading, under the respective plan sites. Geotechnical investigation reports would provide recommendations for grading and for foundation design to reduce hazards to people and structures arising from liquefaction and other seismic-related ground failure. Future development plans proposed within the Project Area allowed by the Proposed Project would be required to adhere to existing building and grading codes, and construction-related grading requires the preparation and submittal of site-specific grading plans and geotechnical reports that must be reviewed and approved by the County beforehand. Each future development plan would be required to comply with the recommendations in its geotechnical investigation report and comply with the County Building Code, thereby reducing such hazards to a less than significant level.

A5-10 The DEIR acknowledges that the Project Area is located in a seismically active region, similar to other areas of southern California. As stated in the DEIR, the State regulates development through a variety of tools that reduce hazards from earthquakes and other geologic hazards. The County Building Code contains building design and construction requirements that are intended to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards.

A5-11 As stated in Section 1.2.2 of the DEIR, this DEIR has been prepared to satisfy the requirements for a Program EIR. Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are typically more conceptual and may contain a more general or qualitative discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a Program EIR provides the

County (as lead agency) with the opportunity to consider broad policy alternatives and program-wide mitigation measures and provides the County with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis. A Program EIR generally establishes a framework for "tiered" or project-level environmental documents that are prepared in accordance with the overall program.

Considering that the Project Area includes over 1,800 square miles, it is not possible to complete project-specific geotechnical studies for all properties located within the Project Area. As a result, reliance on the County Building Code, which requires preparation of site-specific geotechnical studies when development is proposed, is appropriate at this level of planning.

A5-12 Similar to your request, Mitigation Measures CUL-2 and CUL-3 have been included in the DEIR to protect potential archaeological and paleontological resources that are likely to exist in the Project Area.

A5-13 Section 5.17.2, *Water Supply and Distribution Systems*, of the DEIR acknowledges the long-term water supply problems in the Project Area and concludes that full buildout of the Project Area allowed by the Proposed Project would result in a significant unavoidable adverse impact. The DEIR contains numerous mitigation measures to ensure that future development identifies adequate water supplies before it is approved.

With regards to the suggested mitigation measures, a groundwater management plan for the Antelope Valley has already been adopted as part of the Antelope Valley Integrated Regional Water Management Plan 2013. The second mitigation measure is already required by SB 221 and SB 610 which require identification of an adequate water supply in normal and dry years for a 20-year period.

A5-14 Issues related to fire protection and provision of emergency services are addressed in Section 5.14-1 of the DEIR. Issues related to traffic and circulation, including impacts to I-5 and SR-138 are addressed in Section 5.16 of the DEIR. Feasible mitigation measures are identified in the DEIR to address fire protection and traffic-related issues. No additional changes are necessary.

A5-15 As shown on Tables 5.16-15 and 5.16-16 of the DEIR, 101 roadway segments throughout the Project Area were analyzed including numerous roadways located west of SR-14. In addition, various freeway/highway segments were analyzed including I-5, SR-138, and SR-14. The traffic study for the Proposed Project was prepared in accordance with the County's traffic study guidelines under the direction of County Department of Public Works and in consultation with Caltrans. As a result, the traffic analysis contained in the DEIR provides an adequate description of the potential traffic impacts of the Proposed Project.

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A5-16 Mitigation measures T-1 through T-6 have been identified in Section 5.16.8 of the DEIR to address the need for project-level traffic studies and future roadway improvements to maintain adequate levels of service at buildout of the Proposed Project. These measures also identify potential funding sources for those improvements including a potential Congestion Mitigation Fee program. These mitigation measures are considered appropriate at this programmatic level of review.

A5-17 No specific development is currently proposed within the EOAs, so no details beyond the land use designations included on the Land Use Policy Maps are currently available.

A5-18 These issues have been addressed above in Responses A4-1 through A4-17. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

LETTER A6–Friends of Antelope Valley Open Space (4 pages)

October 6, 2014

Sent Via Email

Mr. Carl Nadela, AICP
Los Angeles County Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012
tnc@planning.lacounty.gov

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)*

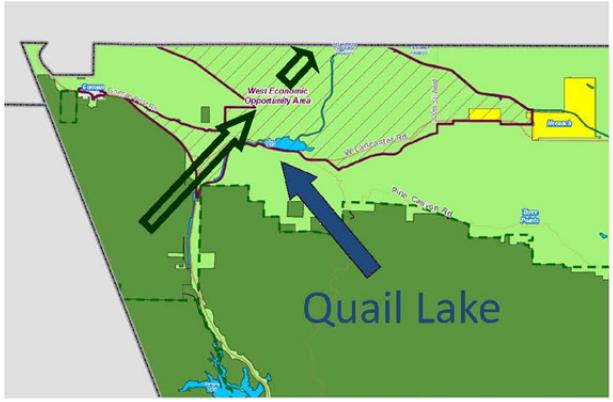
A6-1

2. Response to Comments

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."** A6-1 cont'd



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.*

A6-1 cont'd

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.**

A6-2

2. Response to Comments

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. A6-3

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.** A6-4

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. A6-5

Sincerely,

Margaret Rhyne

On Behalf of Friends of Antelope Valley Open Space

www.avopenspace.org

A6. Response to comments from Margaret Rhyne, Friends of Antelope Valley Open Space, dated October 6, 2014.

A6-1 In 2000, the County commissioned the Los Angeles County Significant Ecological Area Update Study (2000 Update Study), which was subsequently released for public review. Conservation planning was a fundamental aspect of this Study, which was designed to accomplish the following: evaluate existing SEAs for changes in biotic conditions and consider additional areas for SEA status; propose SEA boundaries based upon biotic evaluation; and propose guidelines for managing and conserving biological resources within SEAs. The 2000 Update Study was based on scientifically grounded concepts regarding the size and type of linkage systems necessary to sustain the biologically diverse plant and animal species that are found within the County. All recommended SEAs in the SEA Update Study were evaluated and refined between 2001 and 2002 after consideration of public and resource agency input.

In 2005, the proposed SEAs were again refined, based on the SEA criteria, to address public comment received in 2003 and 2004. Additional field work was conducted, literature review and sensitive species data tables updated, and a subset of the SEAs, called Ecological Transition Areas, identified and mapped. At the end of this process, the County's staff biologists and environmental consultants convened to review the updated SEA boundaries over aerial photography to ensure mapping accuracy. The meeting resulted in all four biologists concurring that the proposed boundaries met the SEA criteria. These refinements were reflected on the draft SEA Map, released for public review as part of the draft General Plan in 2007.

In 2011, the draft SEA Map was released for public review as part of the Los Angeles County Draft 2035 General Plan. Throughout the entirety of the SEA Study and update process, modifications to the proposed boundaries have occurred with careful and deliberate consideration of the adjustments' effect on the continued viability of the entire SEA. The County proposes to expand SEAs and create three new ones in the Project Area as part of the Proposed Project. Under the Proposed Project, the SEA coverage in Project Area would be expanded from 135,772 to 332,899 total acres, providing substantially greater protection of biological resources. Three new SEAs would be created in the southern San Gabriel Mountain area in the southern part of the Project Area. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A6-2 As discussed in Chapter 3 of the DEIR, *Project Description,* expansion of the existing SEA boundaries within the Project Area is part of the Proposed Project. While update to the existing SEA Ordinance is not part of the Proposed Project, it is being considered as part of the comprehensive revision to the 1980 Countywide General Plan. As a result, the DEIR analyzes biological impacts based on the expanded SEA boundaries proposed as part of the Project, and considers impacts under the existing

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SEA Ordinance as well as the Proposed SEA Ordinance. As a result, the Proposed Project can proceed prior to adoption of the Proposed SEA Ordinance.

A6-3 Section 5.1, *Aesthetics,* of the DEIR acknowledges the importance of the Antelope Valley California Poppy Preserve as a scenic resource. Potential aesthetic impacts to this resource are discussed on Page 5.1-20 of the DEIR. No additional changes to the DEIR are necessary. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A6-4 Comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A6-5 Comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

LETTER A7 – California Department of Fish and Wildlife (7 pages)

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
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San Diego, CA 92123
(858) 467-4201
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

October 6, 2014

Mr. Carl Nadela
County of Los Angeles Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012
E-mail: lnc@lacounty.gov

Subject: Comments on the Draft Program Environmental Impact Report for the Antelope Valley General Plan Update, County of Los Angeles (SCH # 2014061043)

Dear Mr. Nadela:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Program Environmental Impact Report (DPEIR). The DPEIR addresses the environmental effects associated with the implementation of the proposed Antelope Valley General Plan Update including associated zoning consistency and ordinances as well as a new land use policy map (Project). The Project is a comprehensive update to the adopted 1986 Antelope Valley Areawide General Plan. As a component of the Los Angeles County (County) General Plan, the Project would refine the countywide goals and policies in the Adopted General Plan by addressing specific issues relevant to the Project Area. The Department also provided comments on the Notice of Preparation on July 7, 2014.

The Project area is located in the northern part of Los Angeles County, covering approximately 1,800 square miles. The Project Area includes over two dozen unincorporated communities. The Project area borders Ventura County to the west, Kern County to the north, San Bernardino County to the east, and the Cities of Santa Clarita, Los Angeles, Pasadena, Sierra Madre, Duarte, Azusa, and Glendora to the south. The Project Area excludes the incorporated cities of Lancaster and Palmdale. These unincorporated areas contain large amounts of sparsely populated land and include the Angeles National Forest, part of the Los Padres National Forest, and part of the Mojave Desert.

The DPEIR analyzes three alternatives to the proposed Project: No-Project/Adopted Area Plan Alternative; Reduced Intensity Alternative; and the Alternative Land Use Policy Map. Next to the No-Project Alternative, the Reduced Intensity Alternative was considered the environmentally superior alternative in the DEIR.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the Project (CEQA Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed Project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq.

1. Project Alternatives. Reduced Intensity Alternative – Section 7.5, page 7-13 of the DPEIR states the Reduced Intensity Alternative "would reduce the overall additional development intensity by 30 percent within each Project Area as compared to the Proposed Project." A7-1

Conserving California's Wildlife Since 1870

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Section 7-7, page 7-23 describes that the Reduced Intensity Alternative is considered the environmentally superior alternative. Section 7.5.4, page 7-14 states "Since the Reduced Intensity Alternative does not reduce the amount of land designated for development, impacts to biological resources would be similar to the Proposed Project, and would remain significant."

The Department requested in the NOP that the DPEIR define the word "intensity" as compared to the word "density" and clarify further why reducing intensity of development does not reduce impacts to biological resources. Please confirm if the Reduced Intensity Alternative will allow build-out to occur over a greater area thereby resulting in potentially greater impacts to biological resources. The Department recommends avoiding sensitive biological resources in the Project Area by planning for denser developments within smaller footprints of land. This could reduce project footprints including fuel modification, access roads, and other infrastructure necessities. A7-1 cont'd

2. Conservation and Open Space (COS) Element. The COS Element in the DPEIR describes policies that are protective of agricultural uses in the Project Area. Policy COS 6.2 on page 5.10-15 recommends limiting incompatible non-agricultural uses in Agricultural Resource Areas (ARAs). Impact 5.2-5 on page 5.2-21 describes land use compatibilities of the Project related to agricultural lands and states: "Agricultural use can be incompatible with some other land uses – such as residential, school, hospital, and day care uses–due to pesticide use, noise, dust emissions, and odors."

The DPEIR should state that agricultural use can be considered incompatible with biological resources in Impact Section 5.2-5. The Department continues to be concerned that unregulated agricultural practices in the Project Area result in the unmitigated loss of biological diversity and associated special status species and jurisdictional waters of the state. The DPEIR should discuss if Project related agricultural land use elements and goals may result in degradation of biological resources. COS element goals promoting agricultural uses appears inconsistent with other elements and goals in the Project that are protective of biological resources. It also appears that the Plan promotes agricultural activities however the lead agency has little or no authority to regulate these activities to assure compliance with established laws that are protective of biological resources. Project elements and policies that impacts natural habitats, absent mitigation, should be considered a significant direct and cumulative impact. A7-2

The Department also believes that agricultural lands, if properly managed, can be very beneficial in supporting biological diversity. This concept should be supported in the Plan.

The DPEIR should explain further why the proposed Significant Ecological Areas are not included within designated ARAs that support high biological diversity in the Project Area.

3. Land Use Policy. Land Use (LU) Policy LU 1.1.7 on page 5.2-22 states: "Preserve and protect important agricultural resources, including farmland and grazing land, through designating these areas as Rural Land on the Land Use Map where appropriate. A7-3

See comment 2 above regarding Project elements and policies that should merit further impact analysis for impacts to biological resources.

Mr. Carl Nadela
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The Department is concerned with the continued effects of unregulated grazing on sensitive habitats in the Project Area including protected open space acquired and managed in-part with taxpayer funded sources. Protected natural open space areas in the arid desert environment of the Project Area can be severely damaged by grazing animals allowed to enter these areas and necessitates resource intensive remedies such as erecting exclusion fencing, patrol and long term restoration to protect biological attributes on these properties. Unauthorized grazing can also further increases management costs for land developers who are required to arrange for the acquisition and management of habitat conservation lands to mitigate for their projects. Policies that encourage or maintain the practice of grazing within the Project Area should be considered a direct and cumulative impact under CEQA unless the DPEIR includes avoidance and mitigation measures within the Land Use, Agricultural and Conservation and Open Space elements and policies to avoid and or reduce these impacts. Such a measure may include regulation and enforcement of certain grazing practices within the Project Area. This would necessitate greater enforcement resources in the Project Area and should be a topic of discussion in the DPEIR. A7-3 cont'd

4. Existing Wildlife and Botanical Resource Conditions – Section 5.4.1.2 of the DPEIR describes existing biological resources within the Project Area, and page 5.4-16, Figure 5.4-1 titled, Sensitive Biological Resources, shows the locations of special-status plant and wildlife species occurrences within the Project Area. Additional Figures of sensitive biological resources are located in Appendix G of this DPEIR, describing existing records for sensitive species within the Project Area. Table 5.4-2 on page 5.4-27 through page 5.4-47 describes sensitive plant communities located within the Project Area.

Considering the shelf-life of the Project, the Project should include measures for adaptive management based upon any new species account information. Undocumented wildlife and plant communities and species accounts are likely to be described in the Plan Area in the future following focused survey efforts from subsequent project impact reviews performed under CEQA and from other observations that contribute to this body of information. The Department recommends the DPEIR include a caveat that the known wildlife, plant community, and species occurrences referenced throughout the DPEIR may be subject to refinement based upon new information. A7-4

The Department recommends that the Project require as a standard, that all botanical assessments for CEQA purposes use the vegetation classifications found in the most current edition of A Manual of California Vegetation, which provides a standardized, systematic classification and description of vegetation in the State. Many CEQA documents received by the Department describe native vegetation in generic terms such as "chaparral" or "coastal sage scrub" that tend to downplay any significant vegetation resources on the Project site. The Department's guidelines should make it easier for the lead agency to determine which Projects are impacting rare habitat because the different dominant communities on-site will be described at a level to allow meaningful assessment. The classification system has been the State standard since 2009 and requiring this system in the Project will facilitate planning consistency. A7-5

Further guidance on nomenclature standards and assessing Project impact significance can be found on the following Department's website: http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp.

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The Department recommends Desert Dune Scrub communities be added to the Vegetative Community List in the DPEIR. Representative scrub types found in Desert Dune Scrub include but are not limited to:

Halophytic saltbush

Halophytic saltbush communities are dominated by shadscale (*Atriplex confertiflora*) or spinescale (*Atriplex spinifera*), and occur adjacent to lakebeds, clay pans, and drainages. The depth of sand deposits determines the diversity of plant species in the saltbush communities (USACE, 2004). The areas nearest the lakebed and areas scoured by floods are dominated by heavy clay soils and contain spinescale. Plants such as alkali sacaton (*Sporobolus airoides*), Joshua trees, and four-wing saltbush (*Atriplex canescens*) are commonly found within this plant community (Jones and Stokes 2011). A7-6

Xerophytic saltbush

The xerophytic communities are dominated by allscale (Atriplex polycarpa) (Jones and Stokes 2008). These plant communities are generally located at slightly higher elevations than halophytic communities.

5. Wildlife Linkages – Page 5.4-68 of the DPEIR describes regional wildlife linkages and states "The South Coast Missing Linkages report identifies landscape linkages throughout Southern California that are considered important for habitat connectivity. The report identifies four linkages that include parts of the Project Area."

The South Coast Missing Linkages report is an excellent reference source from which to begin the evaluation of wildlife movement resources within the Project Area. However this reference should not be relied upon solely for Project specific movement resource assessment and planning purposes because this reference is not an exhaustive study of the County and includes wildlife movement opportunities observed at the time of its publication. Subsequent CEQA review should evaluate the potential for additional wildlife movement resources on a project by project basis. A7-7

6. Watershed and Groundwater Protection – Page 5.4-74 of the DPEIR describes COS policies that are protective of sensitive habitats and species. Policy COS 4.4 pertains to Significant Ecological Areas (SEAs) and states: "Maintenance of watershed connectivity by capturing, treating, retaining, and/or infiltrating storm water flows on site." Page 5.9-24 of the DPEIR states "According to Appendix G of the CEQA Guidelines, a Project would normally have a significant effect on the environment if the Project would: HYD-b Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which water permits have been granted." A7-8

The Department is concerned about the present and future status of groundwater availability in supporting and enhancing biological resources. This concern is based upon: current drought conditions; the recognition of the potential of more numerous droughts and

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their severity resulting from climate change; projected build-out scenarios analyzed in the Project; and continued unsustainable and unregulated ground water pumping in the Project Area. The Project should discuss how protection of groundwater resources within the Project Area will be facilitated and managed in a sustainable manner in order to maintain and restore biological resources while accommodating development in the Plan Area. The Department recommends this discussion include present regulatory conditions and how the Project will accommodate for adaptive measures in policy and plans to incorporate any future ground water regulatory measures that may be implemented. In addition to the SEAs, the Project should consider including a broader discussion that recognizes the watershed value of permeable surfaces within the entire Project Area as a whole and their contribution to water quality, groundwater storage and biological value. This should be a component in subsequent project impact analysis under CEQA when permeable surfaces are reduced by hard-scaping, thus reducing watershed values. A7-8 cont'd

7. Mitigation Measure BIO–1, page 5-4-89 of the DPEIR describes how activities conducted under the Project that may adversely impact biological resources shall be reduced and states: "Biological resources shall be analyzed on a Project-specific level by a qualified biological consultant. A general survey shall be conducted to characterize the Project site, and focused surveys should be conducted as necessary to determine the presence/absence of special status species (e.g., focused sensitive plant or wildlife surveys). A biological resources assessment report should be prepared to characterize the biological resources on-site, analyze Project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The report should include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of biological resources on-site (e.g., observed and detected species as well as an analysis of those species with potential to occur onsite)."

   Scientifically sound methodologies are necessary to insure the adequacy of biological resource assessments, especially if these assessments are utilized by the lead agency to determine Project significance. Without a focused survey effort, many special status species can be missed and presumed absent from a project site utilizing reconnaissance level survey approaches that adhere to general parameters intended to predict presence or absence. These general parameters include but are not limited to reliance upon literature searches of reported species lists, species range and soil type assumptions and ignoring presence of species that are considered common throughout the majority of their range but are rare or unique within the County or a particular location within the County. Because this problem is especially the case for detecting botanical species, the Department recommends that a thorough, recent floristic-based assessment of special status plants and natural communities be performed in the Project area, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see http://www.dfg.ca.gov/habcon/plant/). A7-9

8. Impact 5.8-5, page 5.8-20 of the DPEIR describes Project impacts to structures and/or residences to wildfire hazards and states: "In an effort to reduce the threats to lives and property, the LACoFD has instituted a variety of regulatory programs and standards for vegetation management, pre-fire management and planning, fuel modification, and brush clearance." Impact 5.4-1, page 5.4-77 describes that Project impacts to special status species could result from "residential and commercial development, or through other activities such as fuel modification and flood control." Mitigation BIO-1 as described in A7-10

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Comment 7 above is included as a measure to mitigate for Impact 5.4-1 and includes a biological resource assessment, impact analysis and mitigation measures to be implemented on a project specific basis.

The Department is concerned that Project brush clearing activities within the County for the purposes of reducing wildfire or other hazards or for other purposes such as preparing properties for eventual development, may escape adequate biological resource protective regulatory oversight by local governmental agencies responsible for implementing fuel modification, vector abatement or other clearing or grading related codes that are protective of public safety and property. This problem is likely to increase considering Project build-out projections and the increased frequency of wild fires in the Plan Area. Mitigation BIO-1 describes specific measures to assess biological resources within fire hazard areas requiring vegetation clearing in an effort to avoid and mitigate for adverse impacts to these resources. The Lead Agency appears to rely on other governmental entities responsible for fire hazard response to address these issues. It appears that the policies in BIO-1 are not being accomplished on a consistent basis which results in loss of biological resource habitat when property owners are ordered to perform fuel clearance or when lands are otherwise cleared by the LA County Weed Abatement, Fire Department or by other contract entities. A7-10 cont'd

The Department recommends that the County Department of Regional Planning exercise its available authority to establish a brush clearing ordinance within the Project Area that can be documented to protect biological resources from vegetation removal activities. This planning effort could greatly facilitate the preservation of biological diversity in the Project Area. Protective measures for biological resources where vegetation clearing is to take place should include: pre-project surveys for native nesting birds and other special status wildlife and plant species and regulated waters of the state. Where these biological resources cannot be avoided because of public safety concerns and property protection, mitigation measures should be implemented to reduce direct and cumulative impact levels to biological resources.

9. Mitigation Measure BIO-2 – Page 5.4-87 of the DPEIR describes how unavoidable impacts to special statues species will be addressed and states: "Relocations into areas of appropriate restored habitat would have the best chance of replacing/incrementing populations that are lost due to habitat converted to development. Relocation to restored habitat areas should be the preferred goal of this measure. A qualified biologist shall be on site to conduct surveys, to perform or oversee implementation of protective measures, and to determine when construction activity may resume."

   Relocating species as mitigation should be used only as a last resort when a Project cannot avoid impacts to special status species and their habitat. Relocating wildlife and botanical species off of a Project site onto an adjacent recipient site often fails to result in the persistence of species in perpetuity. In order for this measure to have any potential for success in the majority of cases, adjacent habitat in need of restoration and presumably void or below carrying capacity of the targeted species would need to be restored to functioning levels that are supportive of the target species prior to Project commencement and with the restoration goals and success criteria carefully planned. A7-11

10. Mitigation Measure BIO–3 – Page 5.4-90 of the DPEIR states "Currently, development proposed within SEAs requires a conditional use permit which provides additional A7-12

Mr. Carl Nadela
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protection to wildlife movement corridors and other sensitive biological resources. Proposed projects are requested to be designed so that wildlife movement corridors are left in an undisturbed and natural state…"

See Comment 5 above.

It is not clear if the above statement "Proposed projects are requested to be designed so that wildlife movement corridors are left in an undisturbed and natural state…" refers only to project within designated SEAs. The Department recommends that protective measures for wildlife movement corridors be implemented for all applicable locations within and adjacent to the Project Area.

Pages 5.4-59 through 5.4-66 of the DEIR describes the existing and proposed SEAs. The Department has provided input to the Lead Agency over a several year period during the planning process for the proposed expansion of the SEAs within the Project Area. The Department supports the proposed SEA expansions to accommodate the many biological attributes contained within the Project Area and the greater efforts that are proposed to maintain SEA integrity. A7-12 cont'd

The Department recommends the Lead Agency maintain an SEA condition baseline from which to assess future planning and enforcement decisions that would facilitate SEA function in perpetuity. SEAs should be inspected on a regular basis to determine adaptive management planning and enforcement remedial actions that could be initiated to prevent or reduce observed degradations that would significantly or cumulatively degrade SEA function. Inspections should be conducted on a frequency that assures that unauthorized degradation of SEAs are detected within a timely manner within the statute of limitations that would allow enforcement and remedial action available to the lead agency or other resource agencies with regulatory authority over SEA protection.

11. Proposed Zoning – Figure 5.4-6 titled Land Use Designations within SEAs, shows the land use designations within the SEA areas under the Proposed Project.

The Department recommends no high development land use designation proposals within or adjacent to the boundary of any SEA and instead designate consistent land uses that are compatible with the SEA designation. A7-13

We appreciate the opportunity to comment on the DPEIR for the Project and to assist in further minimizing and mitigating Project impacts to biological resources. If you have questions regarding this letter, please contact Mr. Scott Harris by telephone at (626) 797-3170 or email at Scott.P.Harris@wildlife.ca.gov.

Sincerely,

Betty J. Courtney

Betty J. Courtney
Environmental Program Manager I
South Coast Region

ec: Erinn Wilson, CDFW, Los Alamitos
Kelly Schmoker, CDFW, Laguna Niguel
Victoria Chau, CDFW, Los Alamitos
State Clearing House, Sacramento

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A7. Response to comments from Betty J. Courtney, California Department of Fish and Wildlife, dated October 6, 2014.

A7-1 The density of development is the number of units (e.g., people, buildings, or area of developed surfaces) within a designated land area, and varies greatly based on the scale considered and other factors such as household and business size. The Reduced Intensity Alternative, if adopted, would result in a lower number of dwelling units at buildout, a lower population number, and a lower intensity of development within SEAs. Buildout of the Project Area allowed by the Proposed Project would result in a lower intensity of development in the proposed SEAs than the Adopted Area Plan, in part by converting the dominant land use designation Non-Urban 1 (0.5 dwelling unit/acre) and Non-Urban 2 (1 dwelling unit/acre) to Rural Land 20 (1 dwelling unit/20 acres). The Reduced Intensity Alternative reduces potential development, but not the amount of land proposed for development. However, the reduction in densities associated with the Reduced Intensity Alternative would reduce potential biological impacts.

A7-2 The comment that agricultural lands can support biological diversity is noted. Agricultural Resources Areas (ARAs) comprise areas of prime farmland and designated farmlands of state and local important importance, which are typically under cultivation or active in farming uses. The existing SEAs are typically dominated by natural habitats, and additional areas included in the proposed SEAs include landscapes that connect existing SEAs. ARAs were generally not included within proposed SEAs because of their active agricultural uses.

The Proposed Project seeks to protect agricultural uses, in part by limiting incompatible non-agricultural uses in ARAs. There are some ARAs within existing or proposed SEAs, and SEAs and ARAs have shared boundaries in different parts of the Project Area. Limiting residential development within ARAs that are within or adjoin SEAs would have a positive impact on biological resources by avoiding or reducing conversion of farmland to residential or commercial land uses. Agricultural practices can impact sensitive and non-sensitive biological resources, however, the Proposed Project does not expand agricultural land uses and does not contain any specific agricultural activities that when buildout occurs within the Project Area allowed by the Proposed Project, would adversely impact biological resources. The comment acknowledges that the County has little or no authority to regulate agricultural activities to assure compliance with laws and regulations that protect biological resources, including the existing SEA Ordinance.

A7-3 The designation of important agricultural lands as Rural Land would allow for agriculture, equestrian and animal-keeping uses, and single family homes on large lots. This policy would have a beneficial impact on biological resources by limiting habitat conversion and loss that occur as a result of higher density residential and commercial

development. The Proposed Project does not contain policies or actions related to specific grazing practices. See also Response to Comment A4-2.

A7-4 Comment noted. Mitigation Measure BIO-1 (page 5-4.89 of the DEIR) requires that projects that impact biological resources include an analysis of the impacts by a qualified biologist, based on a general survey and focused surveys for sensitive plants and animals as needed. The County will be responsible for implementation of the mitigation measure, and in the process will ensure that the analysis is based on up-to-date information.

A7-5 Comment noted. Standard practice in preparing biological studies is now to use the updated vegetation classifications found in the current edition of *A Manual of California Vegetation*.

A7-6 The halophytic and xerophytic saltbush plant communities were treated as saltbush scrub in the DEIR (page 5.4-17 of the DEIR), based on spatial data and supporting plant community descriptions from CDFW's vegetation and mapping website (see also Response to Comment A4-13). It would not be practical to separate these communities in the FEIR because its distribution is already shown in Figure 5.4-1, *Plant Communities of the Antelope Valley*. The CDFW mapping considered many of the saltbush scrub communities to be associated with playa or salt pan/flat habitats. However, none were noted to be part of a stabilized dune community.

A7-7 Comment noted. Mitigation Measure BIO-1 (page 5-4.89 of the DEIR) requires that projects that impact biological resources include an analysis of impacts based on a general survey and focused surveys for sensitive plants and animals as needed. Although this mitigation does not specifically address wildlife movement, in practice, all projects subject to analysis under CEQA are required to evaluate impacts to wildlife movement corridors and nurseries if the County determines that there is a potentially significant impact to wildlife movement.

A7-8 Comment noted. Water supply issues related to the Proposed Project are discussed in Section 5.17.2, *Water Supply and Distribution Systems*. As described in the DEIR, groundwater resources in the Antelope Valley have been addressed by the Antelope Valley Integrated Regional Water Management Plan 2013 Update.

A7-9 Comment noted. No response required.

A7-10 Projects within the Project Area located on private and County lands, and which involve brush-clearing activities for site development purposes would be subject to the County's environmental checklist and biological reporting and mitigation requirements. The recommendation that the County should establish a brush-clearing ordinance that can protect biological resources from vegetation clearance for fire management purposes is

hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A7-11 Comment noted. No response required.

A7-12 Comment A7-5 concerns vegetation classification, which is not directly related to impacts to wildlife movement. For projects within SEAs, the Conditional Use Permit process can set forth requirements to avoid impacts to wildlife movement corridors. Mitigation Measure BIO-3 re-states this requirement. For impacts to wildlife movement corridors, see Response to Comment A7-7 above. Comments related to SEAs are hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A7-13 Comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

2. Response to Comments

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LETTER A8 – Three Points-Liebre Mountain Town Council (6 pages)

Three Points-Liebre Mountain Town Council
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6 October 2014

SENT VIA EMAIL

Mr. Carl Nadela, AICP
Los Angeles County Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012
tnc@planning.lacounty.gov

Dear Mr. Nadela,

Re: Antelope Valley Area Plan Draft Environmental Impact Review Comments

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? A8-1

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 A8-2

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letter is listed and available in Appendix B, 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. A8-3

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. A8-4

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. A8-5

Mr. Carl Nadela, Regional Planning, DEIR 3 6 October 2014

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. A8-6

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). A8-7

This leads us to zoning consistency issues stemming from not only EOAs, but the conversion of Light Agricultural A-1 to Heavy Agricultural A-2 zoning, which would allow utility-scale renewable energy (RE) without review by the Board of Supervisors. Regional Planning has said this is an "unintended consequence" of conversion. This is difficult to understand, due to the attention given to the AV for placement of large scale RE. The DEIR should discuss detailed impacts and mitigation for a build-out of utility-scale renewable energy across human communities, wildlife habitats, SEAs, open space, agriculture, scenic views, public and private conservation lands, and other sensitive habitats. The DEIR should list total acreage of build-out possible on A-2 land, and a map of areas available to RE. Please do not refer us to the Renewable Energy A8-1 A8-8

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Ordinance, which is unfinished and will not detail those effects now. The document has described population, jobs, non-residential floor space. Please include the effects of the AVAP's promotion of renewable energy. A8-8 cont'd

Several sections of the DEIR deal with AVAP's significant, unavoidable impacts on air quality. There is no doubt that increases in vehicle trips, caused by additional residential, commercial, and industrial development will contribute to non-attainment of ozone and particulate matter in the South Coast Air Basin and the Mojave Desert Air Basin. There is no mention of air quality in the far northwestern county or adjacent Kern Air Quality Board. Gorman residents are already subject to Interstate 5 traffic pollution, as well as drift from the San Joaquin Valley—which has some of the worst air quality in the United States. Please describe the effects of increased air pollution and possible mitigation strategies for northwest AV residents. A8-9 Moreover, there is no discussion of the current increase of Valley Fever, caused by soil disturbance from RE development over thousands of acres, as well as construction development of residential, commercial, and industrial building and other ground disturbance. This excerpt from the article "Death Dust," in New Yorker Magazine, January 20, 2014, gives us an indication as to how prevalent this fungal disease is in the AV:

> This past spring, at a conference on valley fever, Antje Lauer, the soil microbiologist, met up with Ramon Guevara, an epidemiologist who works at the L.A. County Department of Health. Guevara has made it a personal mission to educate people about the emergent issue of cocci in his territory. "In L.A. County, we have so many cases, and we have a potentially large problem, because the population is growing," he told me. The highest rate of infection is in Antelope Valley, a rapidly developing outpost of the county that adjoins the southern edge of the San Joaquin Valley. In the past decade, the number of cases there has increased five hundred and forty-five per cent. . ."People have no idea it's here," he said. While others have been reluctant to tie development to the incidence of valley fever, Guevara is not. **Analyzing U.S. Census data, he found a near-perfect correlation between new privately owned houses and new infections. "We saw an explosion of cases when the housing development exploded," he said.** A8-10

How will the AVAP protect current and future residents from this life-threatening disease, and what percentage of the population is predicted to contract Coccidioidomycosis based on projected population increase predicted by the Plan? What mitigation is effective? Reduced intensity of proposed development areas?

Aesthetic and biological resources provide a great contribution to tourism dollars spent here in the AV. Thousands upon thousands of visitors come to the valley and surrounding areas to observe wildflower blooms in the spring. We have not located, in the DEIR, a scenic resources map that details the extensive fields, here. We know that there are county wildlife sanctuaries that may preserve a small amount of wildflower fields, but feel a discussion needs to be included, and intensive development directed away from areas of botanical value. We do appreciate the inclusion of Scenic Drives and feel that codification of this part of the AVAP will help preserve the aesthetic qualities of our area. Also, dark skies in the outer reaches of the AV provide displays of exceptionally starry nights. Please explain how the increased densities and types of development A8-11

allowed in EOAs will affect wildlife corridors, sensitive habitats and species, dark nights, and tourism economy in the AV, despite plan claims that focus of development in EOAs will preserve important biological environments and scenic areas. A8-11 cont'd

There is no current comprehensive flood control plan in place, and the focus of development to rural towns would place the onus of protection upon those low density communities with little infrastructure to manage flooding and water quality issues. We ask if best management practices have been successful in preventing pollution from stormwater drainage in other parts of Los Angeles County, and how local mountain rural towns' proximity to surface water—sag ponds, lakes, and blue line streams would be affected, since "Potential pollutants that could be generated by maximum build out of the Project Area include bacteria/viruses, heavy metals, nutrients, pesticides, organic compounds, sediment, trash and debris, oxygen-demanding substances, and oil and grease" (Page 5.9-26). The DEIR also states "Implementation of these programs and regulatory requirements would reduce storm water pollutants that could affect water quality within the Project Area, thus reducing impacts related to storm water pollution and water quality to less than significant levels"(Page5.9-26). It is difficult to believe that regulations and management practices will reduce the pollution of our communities and watersheds to less than significant, when it has not happened elsewhere in the county. These watersheds fill the greater Antelope Valley aquifer and could contribute to pollution of groundwater on the valley floor. Add this effect to those of significant impact that cannot be mitigated. A8-12

Water availability continues to be deeply concerning to current residents, and we ask how the plan can defer effects of increasing population to individual projects, when a piecemeal approach slowly bites away at existing water supplies. An overarching view needs to be explored regarding water usage and depletion of the AV aquifer, cumulative effects of the AVAP EOAs, higher density developments, and sprawl in rural areas, as well as effects to the cities of Lancaster and Palmdale water sources. A8-13

Adverse effects on United States Forest Service (USFS) Lands—Angeles Forest and the Los Padres Forest—nearest large population centers of the greater Los Angeles Area will be most affected by the AVAP. Increased use by hikers, campers, bicyclists, off road vehicles, hunters, and impacts to recreation areas will be substantial. Please note the list of advising agencies did not include the USFS. Considering population that will increase to over four hundred thousand residents, in addition to the millions of visitors from the Los Angeles area, and one could ascertain that these areas will be at increased risk of over-use and degradation, and even though Forest lands are not administered by the county, cumulative impacts should be considered significant and mitigation recommended to reduce permanent damage to forest areas. Increased fire risk could affect USFS budgets when urban-wildland interface threatens forests with wildfire and the promotion of RE includes wind turbines in mountainous areas near forests. RE could also have deleterious effects on wildlife, including birds like the Southern California Spotted Owl and California Condors, that depend upon forest as habitat, as well as the newly designated wilderness areas in the Angeles and Los Padres Forests. A8-14

Finally, we approach discussion of plan alternatives. It is noted that a "no project plan" is dismissed because continued use of the adopted plan would create more biological impact than the proposed A8-15

2. Response to Comments

AVAP. Various versions of the Land Use map were rejected by the Lead Agency as stated in Chapter 7: "While some of these previous variations would have represented the opinions of a segment of stakeholders more strongly or would have reduced environmental impacts more than the Proposed Project or other alternatives considered, they were not appropriate for analysis in the DEIR because they are no longer being pursued by the Lead Agency. It is our opinion that other versions of the map or plans that would reduce environmental impacts more than the proposed plan should be considered and offered for public review for comment. Just because they are not being pursued by RP does not mean that they do not represent a better alternative. The DEIR discusses an alternative plan map, but does not provide the map for reader review. It is compared to other alternatives in Table 7-3, page 7-24. It proves to be environmentally superior, yet it is not chosen to go forward as part of the AVAP. We ask that the FEIR provide further discussion and publication of the map, and that RP consider re-evaluating the Proposed Plan that includes original expansion of SEAs, and redirection of high-density, intensive use areas, in which public services, natural resources, biological resources, and rural communities are preserved and protected from inappropriate development. A8-15 cont'd

Sincerely,

Susan Zahnter
Vice President
on behalf of Three Points-Liebre Mountain Town Council

A8. Response to comments from Susan Zahnter, Three Points-Liebre Mountain Town Council, dated October 6, 2014.

A8-1 The Proposed Area Plan and associated zoning consistency (Proposed Project) is a comprehensive update to the adopted 1986 Antelope Valley Areawide General Plan (Adopted Area Plan). It is the result of a highly inclusive and extensive community participation effort launched in 2007. Through a series of many community meetings, residents and other stakeholders worked alongside County planners to develop a shared vision of the future, identify community issues, draft proposals for the future, and prioritize their recommendations, forming the foundation of the Proposed Area Plan. Building on the foundation laid by the region's communities and from input with other stakeholders, planners partnered with other County departments to explore the recommendations; and refine the proposed goals and policies, plan for program implementation.

The Proposed Project analyzed in the DEIR was the August 2014 version of the Proposed Area Plan. If any additional updates to the Proposed Area Plan are proposed, they will need to be evaluated for consistency with the Proposed Project analyzed in the DEIR prior to certification of the EIR by the County Board of Supervisors.

A8-2 Comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A8-3 The NOP comment letter from the Three Points-Liebre Mountain Town Council was properly received by the County on July 11, 2014 and included in Appendix B. Although the letter was inadvertently left out of Table 1-2, the comments were considered and addressed in the DEIR. Table 1-2 of the DEIR has been revised as follows:

Table 1-2 Summary of NOP Comments

Commenting Agency/Person	Comment Type	Comment Summary	Issue Addressed In:
Organizations			
Three Points-Liebre Mountain Town Council	Aesthetics; Agriculture and Forestry Resources; Air Quality/Greenhouse Gas Emissions; Biological Resources; Economics/Jobs; Hazards and Hazardous Materials; Hydrology/Water Quality; Noise; Land Use; Utilities	• Requests analysis of impacts to aesthetics due to development along scenic roadways • Requests consideration of impacts to agricultural areas due to renewable energy projects and impacts to forestry resources due to development • Requests analysis of impacts related to air quality and GHG emissions due to increased development; impacts related to Valley Fever • Requests analysis of impacts biological resources, including wildlife corridors. • Requests analysis of economic impacts related to increased industrial development • Requests analysis of impacts related to	Sections 5.1, *Aesthetics*, 5.2, *Agriculture and Forestry Resources*, 5.3, *Air Quality*, 5.4, *Biological Resources*, 5.6, *Geology and Soils*, 5.7, *Biological Resources*, 5.8, *Hazards and Hazardous Materials*, 5.9, *Hydrology and Water Quality* 5.10, *Land Use and Planning*, 5.12, *Noise*, 5.13, *Population and Housing*, and 5.17, *Utilities and Service Systems.*

2. Response to Comments

Table 1-2 Summary of NOP Comments

Commenting Agency/Person	Comment Type	Comment Summary	Issue Addressed In:
	and Service Systems;	increased hazards from flooding and fire hazards • Requests analysis of impacts to water supply • Requests analysis of impacts related to noise from increased vehicle and truck traffic • Requests analysis of land use impacts associated with the proposed goals and policies and Economic Opportunity Areas (EOAs)	

A8-4 In 2000, the County commissioned the Los Angeles County Significant Ecological Area Update Study (2000 Update Study), which was subsequently released for public review. Conservation planning was a fundamental aspect of this Study, which was designed to accomplish the following: evaluate existing SEAs for changes in biotic conditions and consider additional areas for SEA status; propose SEA boundaries based upon biotic evaluation; and propose guidelines for managing and conserving biological resources within SEAs. The 2000 Update Study was based on scientifically grounded concepts regarding the size and type of linkage systems necessary to sustain the biologically diverse plant and animal species that are found within the County. All recommended SEAs in the SEA Update Study were evaluated and refined between 2001 and 2002 after consideration of public and resource agency input.

In 2005, the proposed SEAs were again refined, based on the SEA criteria, to address public comment received in 2003 and 2004. Additional field work was conducted, literature review and sensitive species data tables updated, and a subset of the SEAs, called Ecological Transition Areas, identified and mapped. At the end of this process, the County's staff biologists and environmental consultants convened to review the updated SEA boundaries over aerial photography to ensure mapping accuracy. The meeting resulted in all four biologists concurring that the proposed boundaries met the SEA criteria. These refinements were reflected on the draft SEA Map, released for public review as part of the draft General Plan in 2007.

In 2011, the draft SEA Map was released for public review as part of the Los Angeles County Draft 2035 General Plan. Throughout the entirety of the SEA Study and update process, modifications to the proposed boundaries have occurred with careful and deliberate consideration of the adjustments' effect on the continued viability of the entire SEA. The County proposes to expand SEAs and create three new ones in the Project Area as part of the Proposed Project. Under the Proposed Project, the SEA coverage in Project Area would be expanded from 135,772 to 332,899 total acres, providing substantially greater protection of biological resources. Three new SEAs would be created in the southern San Gabriel Mountain area in the southern part of the

Project Area. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A8-5 With regard to the SEA boundaries in the western Antelope Valley, the expansion of the SEAs that would occur under the Proposed Project was the subject of extensive scientific review and public consultation (please see Response to Comment A6-1 for a brief history).

With regard to migratory birds, the DEIR states that the habitats of the Antelope Valley support diverse sedentary and migratory birds (page 5-4.25), that the dry lakes within the Rosamond Dry Lake SEA and Edwards Air Force Base SEA (Piute Ponds, Buckhorn Lake, and Rogers Lake) provide important resting areas for migratory birds on this part of the Pacific Flyway, and that migratory birds of prey forage in agricultural fields in the Antelope Valley (page 5.4-63 of the DEIR). Birds migrate through the Antelope Valley in a broad front, and there is little information on migratory pathways or stopover concentrations (apart from the dry lakes in the Rosamond Dry Lake and Edwards Air Force Base SEAs and the windy passes in the western corner of the Project Area). The comment that the Antelope Valley is identified as an Important Bird Area by the Audubon Society has been added to the text of the FEIR.

The Proposed Project would not impact bird migratory pathways, but the buildout of the Project Area allowed by the Proposed Project could adversely impact natural habitats, including those used by migratory birds. In addition, wind farms can result in higher mortality of sensitive raptoral birds such as the golden eagle and Swainson's hawk, sensitive bat species, and indeed any bird or bat species that occurs in the area as a result of collision with wind turbines. This has been added to the impact analysis under Impact 5.4-1 (impacts to sensitive species):

> Nonetheless, buildout of the Proposed Project will result in impacts to various habitat types, which will result in the loss of special-status species through direct mortality, habitat loss, and edge effects at the urban-wildland interface. <u>In addition, wind energy projects could be allowed within various industrial and rural designations in the Project Area. Wind farms can result in higher mortality of sensitive raptoral birds such as the golden eagle, Swainson's hawk, sensitive bat species, and indeed any bird or bat species that occurs in the area, as a result of collision with wind turbines.</u> As a consequence, buildout of the Proposed Project will have a significant adverse effect on special-status species.

While the Proposed Area Plan addresses issues related to renewable energy through various goals and policies, it does not designate specific locations for future renewable energy projects. However, renewable energy projects could be allowed within various industrial and rural designations in the Proposed Area Plan, including in the areas designated light industrial along SR-138 east of Quail Lake. However, the Proposed

Project does not entitle any renewable energy project, and any such projects would be subject to project-level review, including consideration of their impacts to biological resources.

With regard to the California condor, the DEIR states that the species forages in the western part of the Plan Area (pages 5.4-26, 5.4-52) and is one of the sensitive wildlife species that would be adversely impacted by the Proposed Project (5.4-77).

With regard to wildlife movement corridors, the DEIR describes the corridor in the northwestern part of the Project Area (the Tehachapi connection, page 5-4.68 of the DEIR). The Tehachapi connection is largely outside the Project Area. The part of this connection within the Project Area is a small lowland area in the northwestern corner of the Project Area. The DEIR concludes that the Proposed Project will impact regional wildlife linkages and have a significant adverse effect on wildlife movement (pages 5-495, 86). Nonetheless, existing infrastructure in the northeastern part of the Project Area already restricts wildlife movement, especially the California aqueduct and I-5, and to a lesser extent SR-138.

With regard to the impacts of sprawl, one of the main objectives of the Proposed Project is to direct future development within the Project Area to three separate EOAs, while reducing allowable densities elsewhere and allowing for expansion of the existing SEA boundaries. The EOAs were proposed to focus development near major infrastructure opportunities while preserving both open space and greater value habitat elsewhere. The land use designations within each EOA were developed to provide a balance between jobs and housing. Therefore, buildout of the Project Area allowed by the Proposed Project allows for greater opportunities to preserve large, contiguous open space areas as compared to the Adopted Area Plan which allows higher density development over a much larger area. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A8-6 CEQA requires an EIR to consider "the whole of an action" which is proposed for approval, and cannot piecemeal or segment a project to avoid environmental review. The Proposed Project consists of a comprehensive update to the Proposed Area Plan, which provides the general land use designations for the Project Area. The Project Proponent for the Proposed Project is the County. While the Centennial project is located within the Proposed Area Plan, no project-level entitlements will be granted if the Proposed Area Plan is adopted. Any development proposed by the Centennial project will require separate development applications by the landowner/developer, project-level approvals including a community plan or specific plan, tract maps, and a project-level EIR, which will analyze project-specific impacts related to Centennial.

It should be noted that any future development projects within the Proposed Area Plan including Centennial, may tier off of the Program EIR for the Area Plan to the extent permitted by CEQA. "Tiering" refers "to the coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared. Tiering is appropriate when the sequence of EIRs is: [¶] (a) From a general plan, policy, or program EIR to a . . . site-specific EIR." (CEQA Guidelines, § 15385, italics added.)

A8-7 One of the main objectives of the Proposed Project is to direct future development within the Project Area to three separate EOAs, while reducing allowable densities elsewhere and allowing for expansion of the existing SEA boundaries. The EOAs were proposed to focus development near major infrastructure opportunities while preserving both open space and greater value habitat elsewhere. The land use designations within each EOA were developed to provide a balance between jobs and housing. Therefore, implementation of the Proposed Project allows for greater opportunities to preserve large, contiguous open space areas as compared to the Adopted Area Plan which allows higher density development over a much larger area. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A8-8 While the Proposed Area Plan addresses issues related to renewable energy through various goals and policies, it does not designate specific locations for future renewable energy projects. However, renewable energy projects are allowed within various industrial and rural land use designations in the Proposed Area Plan. Therefore, the potential for renewable energy projects within the Project Area is addressed in the DEIR to the extent feasible at this level of planning.

A8-9 The Commenter notes that there is no mention of air quality in the far northwestern county, specifically the Gorman area, and for the area under the jurisdiction of the Eastern Kern Air Pollution Control District (EKAPCD), which does not regulate any portion of the Project Area. The plan-level air quality analysis presented in Chapter 5.3 of the DEIR is for the entire Proposed Area Plan (Project Area). Thus the air quality analysis provides a broad-level discussion of air quality impacts to the Proposed Area Plan as a whole. As the Gorman community is encompassed within the Project Area, the air quality analysis also pertains to this community. The mitigation measures prescribed to reduce air quality impacts are applicable to the entire Proposed Area Plan and would also therefore be applicable to the northwest county area portion of the Project Area.

Regarding the EKAPCD, the air quality analysis includes an assessment of impacts to the Mojave Desert Air Basin (MDAB) as the Project Area is within its boundaries. The analysis showed that project-related emissions would exceed the Antelope Valley Air

Quality Management District (AQMD) regional significance thresholds. These thresholds assess the level at which emissions are considered to result in significant cumulative impacts within the MDAB as a whole. Thus, the impacts disclosed would be inherent impacts to the portion of the MDAB within the jurisdiction of EKAPCD.

A8-10 The Commenter states that Chapter 5.3 of the DEIR does not include a discussion of current increase of Valley Fever. Additionally, the Commenter asks what percentage of the population is predicted to contract Valley Fever based on the population increase and how the Proposed Area Plan would protect current and future residents. In fact, Section 5.3 of the DEIR does include a discussion of Valley Fever in Impact 5.3-2 and notes that it may be an issue associated with development from disturbance of soil during construction activities. The analysis points out that compliance with South Coast Air Quality Management District (SCAQMD) and Antelope Valley Air Quality Management District (AVAQMD) fugitive dust rule would help minimize any potential issues with Valley Fever. Additionally, implementation of Mitigation Measure AQ-1 would also contribute in minimizing fugitive dust emissions and reducing any potential impacts related to Valley Fever. Furthermore, the Proposed Area Plan includes policies that call for preservation of open space areas. Moreover, the overall projected service population (i.e., residents and employees) under the Proposed Area Plan would decrease by approximately 52 percent compared to the Adopted Area Plan.

In terms of what the percent increase in cases of Valley Fever may be due to the anticipated population increase is beyond the scope of this plan level analysis. The Proposed Area Plan is a programmatic document that establishes a land use framework for future growth and does not include or prescribe specific development projects. Thus, it would be speculative to assess what impacts, if any, the project may have on the number of incidences of Valley Fever. In addition, a public health agency such as the County Department of Health would be in the best position to further evaluate this issue and determine how future development in general may impact the spread of Valley Fever based on its epidemiological characteristics.

A8-11 Please refer to Section 5.4, *Biological Resources*, of the DEIR for a discussion of the project-related impacts to wildlife corridors and sensitive habitats and species. Potential impacts related to light and glare are discussed under Impact 5.1-4 starting on Page 5.1-31 of the DEIR. Potential economic impacts are not a CEQA-related issue and are therefore not discussed in the DEIR. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

A8-12 As discussed in Section 5.9, *Hydrology and Water Quality*, of the DEIR, compliance with existing regulatory programs would reduce potential impacts to hydrology and water quality to a level that is less than significant. While future development will be required to comply with existing regulations related to hydrology and water quality, a substantial

amount of existing development in the Project Area and the County was built prior to enactment of the Clean Water Act and County Codes relating to flood control. As a result, flooding and water quality problems continue to occur in older areas of the County.

A8-13 Issues relating to water supply are discussed in Section 5.17.2, *Water Supply and Distribution Systems*, of the DEIR.

A8-14 While it is likely that some of the future residents within the Project Area may occasionally visit the Angeles National Forest and Los Padres National Forest, it is unlikely that the additional use would be significant. Of the 1,130,544 acres included within the Project Area, 547,721 acres, or 48 percent is designated as open space. This represents approximately 1,350 acres of open space per 1,000 population at Proposed Area Plan buildout.

Please refer to Section 5.4, *Biological Resources*, of the DEIR for a discussion of the project-related impacts to wildlife corridors and sensitive habitats and species. As discussed in Section 5.14.1, *Fire Protection and Emergency Services*, the County Fire Department has indicated that potential impacts related to fire hazards are reduced to a less than significant level through compliance with the County Fire Code and mitigation measures in the DEIR. In addition, the Proposed Area Plan limits potential development in Very High Fire Hazard Severity zones through appropriate land use designations with very low residential densities as indicated on the Proposed Area Plan Land Use Policy Map.

A8-15 As discussed in Chapter 7 of the DEIR, three alternatives to the Proposed Project were analyzed in detail including the No Project/Existing Area Plan Alternative, Reduced Intensity Alternative, and the Alternative Land Use Policy Map. In addition, two alternatives were considered during the scoping process for the EIR including various Project Planning Alternatives, and the No Growth/No Development Alternative. As discussed in Section 7.7, the Reduced Intensity Alternative was selected as the Environmentally Superior Alternative. The County considers the five alternatives analyzed in the DEIR to be a "reasonable range" of alternatives which reduce the significant impacts of the project while attaining the basic objectives of the Proposed Project.

2. Response to Comments

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LETTER A9 – Metropolitan Water District of Southern California (24 pages)

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

October 6, 2014 **Via E-Mail and Regular Mail**

Mr. Carl Nadela, AICP
Los Angeles County
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

Dear Mr. Carl Nadela:

Notice of Availability of a Draft Environmental Impact Report for the
Los Angeles County Antelope Valley Areawide General Plan Update, SCH#2014061043

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Draft Environmental Impact Report (Draft EIR) for the Los Angeles County Antelope Valley Areawide General Plan Update (Project). The County of Los Angeles is acting as the Lead Agency under the California Environmental Quality Act (CEQA) for the project. The Project consists of comprehensive updates to the current Antelope Valley Areawide General Plan to update goals and existing policies, develop new land use policy maps, and provide new information and policies where needed. The updates would replace the existing adopted Area Plan and aims to protect important ecological and agricultural resources, preserve rural character, plan for major infrastructure development, accommodate new housing, and support employment. The Project is located within the boundaries of unincorporated Los Angeles County, generally within the Antelope Valley. This letter contains Metropolitan's comments to the Draft EIR as a potentially affected agency.

Metropolitan reviewed the project description of the proposed Project and determined that we own and operate facilities within the project area. The enclosed map shows these facilities in relation to the proposed Project. It will be necessary for the County to consider these facilities in its project planning:

- Upper Feeder, which runs in northwesterly to easterly direction in the cities of Glendora and Duarte; and A9-1
- Glendora Tunnel, which runs in a northwesterly direction in the city of Glendora.

Metropolitan is concerned that potential impacts to these facilities may result from designation of the surrounding areas as a unit of the national park system, mitigation property, or designated for restricted use. Metropolitan will need to conduct routine operational and maintenance work, and

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future repairs on its facilities. Our rights-of-way are operated and maintained by Metropolitan for the purpose of water supply, and any proposed designation of this property should be consistent with this use.

In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, Metropolitan requires that any plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California." Please note that all plans must clearly identify Metropolitan's facilities and rights-of-way. Metropolitan must approve all improvements or proposed uses that are within or affect our rights-of-way. A9-1 cont'd

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation on this Project. If you have any further questions, please contact Ms. Brenda S. Marines at bmarines@mwdh2o.com or (213) 217-7902.

Very truly yours,

Deirdre West
Manager, Environmental Planning Team

BSM/bsm
(EPT No. 2014082511)

Enclosure: Map
Guidelines

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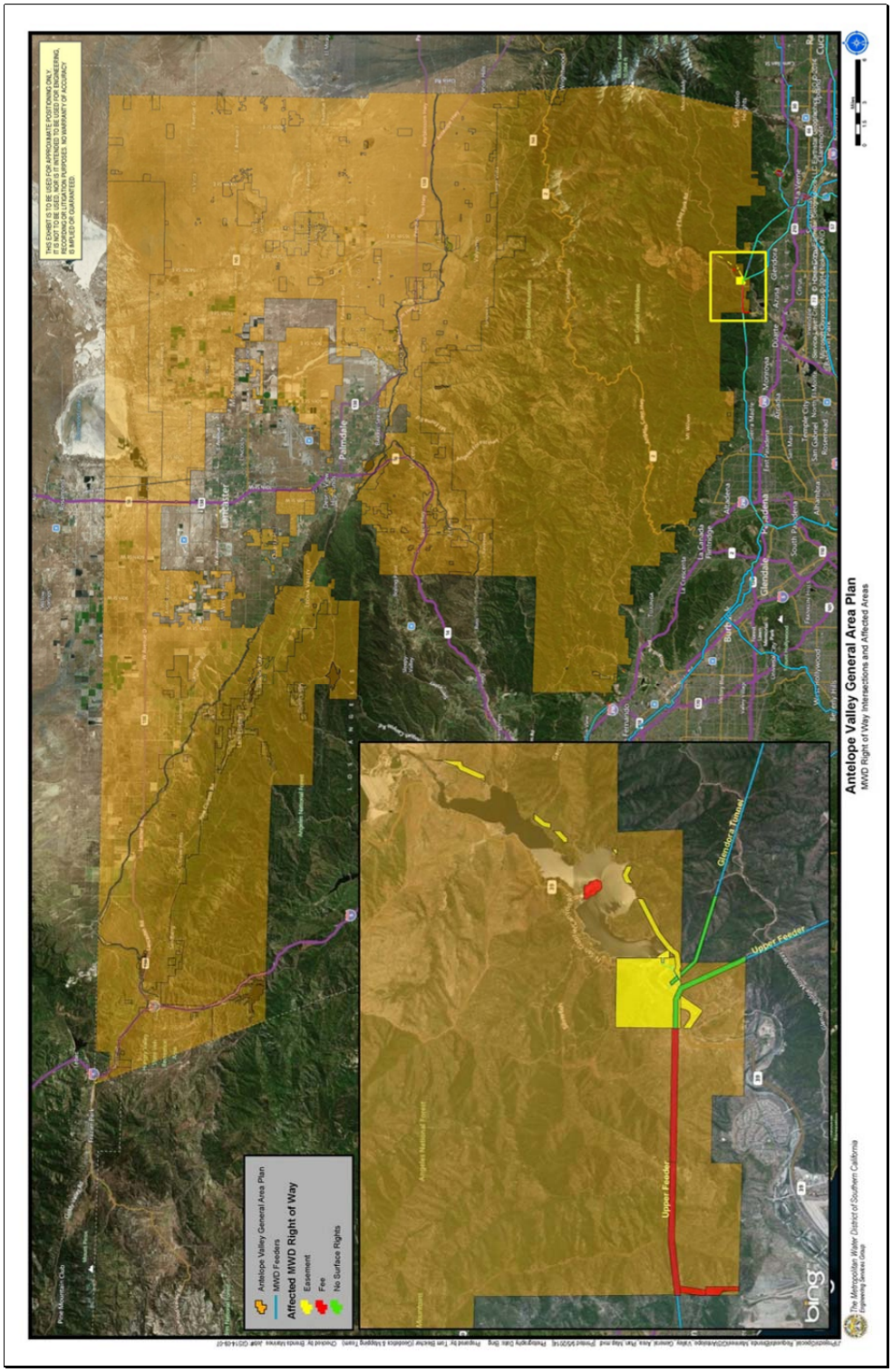

2. Response to Comments

Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California

1. Introduction

a. The following general guidelines should be followed for the design of proposed facilities and developments in the area of Metropolitan's facilities, fee properties, and/or easements.

b. We require that 3 copies of your tentative and final record maps, grading, paving, street improvement, landscape, storm drain, and utility plans be submitted for our review and written approval as they pertain to Metropolitan's facilities, fee properties and/or easements, prior to the commencement of any construction work.

2. Plans, Parcel and Tract Maps

The following are Metropolitan's requirements for the identification of its facilities, fee properties, and/or easements on your plans, parcel maps and tract maps:

a. Metropolitan's fee properties and/or easements and its pipelines and other facilities must be fully shown and identified as Metropolitan's on all applicable plans.

b. Metropolitan's fee properties and/or easements must be shown and identified as Metropolitan's with the official recording data on all applicable parcel and tract maps.

c. Metropolitan's fee properties and/or easements and existing survey monuments must be dimensionally tied to the parcel or tract boundaries.

d. Metropolitan's records of surveys must be referenced on the parcel and tract maps.

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3. Maintenance of Access Along Metropolitan's Rights-of-Way

a. Proposed cut or fill slopes exceeding 10 percent are normally not allowed within Metropolitan's fee properties or easements. This is required to facilitate the use of construction and maintenance equipment, and provide access to its aboveground and belowground facilities.

b. We require that 16-foot-wide commercial-type driveway approaches be constructed on both sides of all streets crossing Metropolitan's rights-of-way. Openings are required in any median island. Access ramps, if necessary, must be at least 16-feet-wide. Grades of ramps are normally not allowed to exceed 10 percent. If the slope of an access ramp must exceed 10 percent due to the topography, the ramp must be paved. We require a 40-foot-long level area on the driveway approach to access ramps where the ramp meets the street. At Metropolitan's fee properties, we may require fences and gates.

c. The terms of Metropolitan's permanent easement deeds normally preclude the building or maintenance of structures of any nature or kind within its easements, to ensure safety and avoid interference with operation and maintenance of Metropolitan's pipelines or other facilities. Metropolitan must have vehicular access along the easements at all times for inspection, patrolling, and for maintenance of the pipelines and other facilities on a routine basis. We require a 20-foot-wide clear zone around all above-ground facilities for this routine access. This clear zone should slope away from our facility on a grade not to exceed 2 percent. We must also have access along the easements with construction equipment. An example of this is shown on Figure 1.

d. The footings of any proposed buildings adjacent to Metropolitan's fee properties and/or easements must not encroach into the fee property or easement or impose additional loading on Metropolitan's pipelines or other facilities therein. A typical situation is shown on Figure 2. Prints of the detail plans of the footings for any building or structure adjacent to the fee property or easement must be submitted for our review and written approval as they pertain to the pipeline or other facilities therein. Also, roof eaves of buildings adjacent to the easement or fee property must not overhang into the fee property or easement area.

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e. Metropolitan's pipelines and other facilities, e.g. structures, manholes, equipment, survey monuments, etc. within its fee properties and/or easements must be protected from damage by the easement holder on Metropolitan's property or the property owner where Metropolitan has an easement, at no expense to Metropolitan. If the facility is a cathodic protection station it shall be located prior to any grading or excavation. The exact location, description and way of protection shall be shown on the related plans for the easement area.

4. Easements on Metropolitan's Property

a. We encourage the use of Metropolitan's fee rights-of-way by governmental agencies for public street and utility purposes, provided that such use does not interfere with Metropolitan's use of the property, the entire width of the property is accepted into the agency's public street system and fair market value is paid for such use of the right-of-way.

b. Please contact the Director of Metropolitan's Right of Way and Land Division, telephone (213) 250-6302, concerning easements for landscaping, street, storm drain, sewer, water or other public facilities proposed within Metropolitan's fee properties. A map and legal description of the requested easements must be submitted. Also, written evidence must be submitted that shows the city or county will accept the easement for the specific purposes into its public system. The grant of the easement will be subject to Metropolitan's rights to use its land for water pipelines and related purposes to the same extent as if such grant had not been made. There will be a charge for the easement. Please note that, if entry is required on the property prior to issuance of the easement, an entry permit must be obtained. There will also be a charge for the entry permit.

5. Landscaping

Metropolitan's landscape guidelines for its fee properties and/or easements are as follows:

a. A green belt may be allowed within Metropolitan's fee property or easement.

b. All landscape plans shall show the location and size of Metropolitan's fee property and/or easement and the location and size of Metropolitan's pipeline or other facilities therein.

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c. Absolutely no trees will be allowed within 15 feet of the centerline of Metropolitan's existing or future pipelines and facilities.

d. Deep-rooted trees are prohibited within Metropolitan's fee properties and/or easements. Shallow-rooted trees are the only trees allowed. The shallow-rooted trees will not be permitted any closer than 15 feet from the centerline of the pipeline, and such trees shall not be taller than 25 feet with a root spread no greater than 20 feet in diameter at maturity. Shrubs, bushes, vines, and ground cover are permitted, but larger shrubs and bushes should not be planted directly over our pipeline. Turf is acceptable. We require submittal of landscape plans for Metropolitan's prior review and written approval. (See Figure 3).

e. The landscape plans must contain provisions for Metropolitan's vehicular access at all times along its rights-of-way to its pipelines or facilities therein. Gates capable of accepting Metropolitan's locks are required in any fences across its rights-of-way. Also, any walks or drainage facilities across its access route must be constructed to AASHTO H-20 loading standards.

f. Rights to landscape any of Metropolitan's fee properties must be acquired from its Right of Way and Land Division. Appropriate entry permits must be obtained prior to any entry on its property. There will be a charge for any entry permit or easements required.

6. Fencing

Metropolitan requires that perimeter fencing of its fee properties and facilities be constructed of universal chain link, 6 feet in height and topped with 3 strands of barbed wire angled upward and outward at a 45 degree angle or an approved equal for a total fence height of 7 feet. Suitable substitute fencing may be considered by Metropolitan. (Please see Figure 5 for details).

7. Utilities in Metropolitan's Fee Properties and/or Easements or Adjacent to Its Pipeline in Public Streets

Metropolitan's policy for the alinement of utilities permitted within its fee properties and/or easements and street rights-of-way is as follows:

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a. Permanent structures, including catch basins, manholes, power poles, telephone riser boxes, etc., shall not be located within its fee properties and/or easements.

b. We request that permanent utility structures within public streets, in which Metropolitan's facilities are constructed under the Metropolitan Water District Act, be placed as far from our pipeline as possible, but not closer than 5 feet from the outside of our pipeline.

c. The installation of utilities over or under Metropolitan's pipeline(s) must be in accordance with the requirements shown on the enclosed prints of Drawings Nos. C-11632 and C-9547. Whenever possible we request a minimum of one foot clearance between Metropolitan's pipe and your facility. Temporary support of Metropolitan's pipe may also be required at undercrossings of its pipe in an open trench. The temporary support plans must be reviewed and approved by Metropolitan.

d. Lateral utility crossings of Metropolitan's pipelines must be as perpendicular to its pipeline alinement as practical. Prior to any excavation our pipeline shall be located manually and any excavation within two feet of our pipeline must be done by hand. This shall be noted on the appropriate drawings.

e. Utilities constructed longitudinally within Metropolitan's rights-of-way must be located outside the theoretical trench prism for uncovering its pipeline and must be located parallel to and as close to its rights-of-way lines as practical.

f. When piping is jacked or installed in jacked casing or tunnel under Metropolitan's pipe, there must be at least two feet of vertical clearance between the bottom of Metropolitan's pipe and the top of the jacked pipe, jacked casing or tunnel. We also require that detail drawings of the shoring for the jacking or tunneling pits be submitted for our review and approval. Provisions must be made to grout any voids around the exterior of the jacked pipe, jacked casing or tunnel. If the piping is installed in a jacked casing or tunnel the annular space between the piping and the jacked casing or tunnel must be filled with grout.

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g. Overhead electrical and telephone line requirements:

1) Conductor clearances are to conform to the California State Public Utilities Commission, General Order 95, for Overhead Electrical Line Construction or at a greater clearance if required by Metropolitan. Under no circumstances shall clearance be less than 35 feet.

2) A marker must be attached to the power pole showing the ground clearance and line voltage, to help prevent damage to your facilities during maintenance or other work being done in the area.

3) Line clearance over Metropolitan's fee properties and/or easements shall be shown on the drawing to indicate the lowest point of the line under the most adverse conditions including consideration of sag, wind load, temperature change, and support type. We require that overhead lines be located at least 30 feet laterally away from all above-ground structures on the pipelines.

4) When underground electrical conduits, 120 volts or greater, are installed within Metropolitan's fee property and/or easement, the conduits must be incased in a minimum of three inches of red concrete. Where possible, above ground warning signs must also be placed at the right-of-way lines where the conduits enter and exit the right-of-way.

h. The construction of sewerlines in Metropolitan's fee properties and/or easements must conform to the California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Services and the local City or County Health Code Ordinance as it relates to installation of sewers in the vicinity of pressure waterlines. The construction of sewerlines should also conform to these standards in street rights-of- way.

i. Cross sections shall be provided for all pipeline crossings showing Metropolitan's fee property and/or easement limits and the location of our pipeline(s). The exact locations of the crossing pipelines and their elevations shall be marked on as-built drawings for our information.

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j. Potholing of Metropolitan's pipeline is required if the vertical clearance between a utility and Metropolitan's pipeline is indicated on the plan to be one foot or less. If the indicated clearance is between one and two feet, potholing is suggested. Metropolitan will provide a representative to assists others in locating and identifying its pipeline. Two-working days notice is requested.

k. Adequate shoring and bracing is required for the full depth of the trench when the excavation encroaches within the zone shown on Figure 4.

l. The location of utilities within Metropolitan's fee property and/or easement shall be plainly marked to help prevent damage during maintenance or other work done in the area. Detectable tape over buried utilities should be placed a minimum of 12 inches above the utility and shall conform to the following requirements:

1) Water pipeline: A two-inch blue warning tape shall be imprinted with:

"CAUTION BURIED WATER PIPELINE"

2) Gas, oil, or chemical pipeline: A two-inch yellow warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

3) Sewer or storm drain pipeline: A two-inch green warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

4) Electric, street lighting, or traffic signals conduit: A two-inch red warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

5) Telephone, or television conduit: A two-inch orange warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

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m. Cathodic Protection requirements:

1) If there is a cathodic protection station for Metropolitan's pipeline in the area of the proposed work, it shall be located prior to any grading or excavation. The exact location, description and manner of protection shall be shown on all applicable plans. Please contact Metropolitan's Corrosion Engineering Section, located at Metropolitan's F. E. Weymouth Softening and Filtration Plant, 700 North Moreno Avenue, La Verne, California 91750, telephone (714) 593-7474, for the locations of Metropolitan's cathodic protection stations.

2) If an induced-current cathodic protection system is to be installed on any pipeline crossing Metropolitan's pipeline, please contact Mr. Wayne E. Risner at (714) 593-7474 or (213) 250-5085. He will review the proposed system and determine if any conflicts will arise with the existing cathodic protection systems installed by Metropolitan.

3) Within Metropolitan's rights-of-way, pipelines and carrier pipes (casings) shall be coated with an approved protective coating to conform to Metropolitan's requirements, and shall be maintained in a neat and orderly condition as directed by Metropolitan. The application and monitoring of cathodic protection on the pipeline and casing shall conform to Title 49 of the Code of Federal Regulations, Part 195.

4) If a steel carrier pipe (casing) is used:

(a) Cathodic protection shall be provided by use of a sacrificial magnesium anode (a sketch showing the cathodic protection details can be provided for the designers information).

(b) The steel carrier pipe shall be protected with a coal tar enamel coating inside and out in accordance with AWWA C203 specification.

n. All trenches shall be excavated to comply with the CAL/OSHA Construction Safety Orders, Article 6, beginning with Sections 1539 through 1547. Trench backfill shall be placed in 8-inch lifts and shall be compacted to 95 percent relative compaction (ASTM D698) across roadways and through protective dikes. Trench backfill elsewhere will be compacted to 90 percent relative compaction (ASTM D698).

2. Response to Comments

o. Control cables connected with the operation of Metropolitan's system are buried within streets, its fee properties and/or easements. The locations and elevations of these cables shall be shown on the drawings. The drawings shall note that prior to any excavation in the area, the control cables shall be located and measures shall be taken by the contractor to protect the cables in place.

p. Metropolitan is a member of Underground Service Alert (USA). The contractor (excavator) shall contact USA at 1-800-422-4133 (Southern California) at least 48 hours prior to starting any excavation work. The contractor will be liable for any damage to Metropolitan's facilities as a result of the construction.

8. Paramount Right

Facilities constructed within Metropolitan's fee properties and/or easements shall be subject to the paramount right of Metropolitan to use its fee properties and/or easements for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove any of the facilities from the fee properties and/or easements, such removal and replacement shall be at the expense of the owner of the facility.

9. Modification of Metropolitan's Facilities

When a manhole or other of Metropolitan's facilities must be modified to accommodate your construction or reconstruction, Metropolitan will modify the facilities with its forces. This should be noted on the construction plans. The estimated cost to perform this modification will be given to you and we will require a deposit for this amount before the work is performed. Once the deposit is received, we will schedule the work. Our forces will coordinate the work with your contractor. Our final billing will be based on actual cost incurred, and will include materials, construction, engineering plan review, inspection, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount.

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10. Drainage

a. Residential or commercial development typically increases and concentrates the peak storm water runoff as well as the total yearly storm runoff from an area, thereby increasing the requirements for storm drain facilities downstream of the development. Also, throughout the year water from landscape irrigation, car washing, and other outdoor domestic water uses flows into the storm drainage system resulting in weed abatement, insect infestation, obstructed access and other problems. Therefore, it is Metropolitan's usual practice not to approve plans that show discharge of drainage from developments onto its fee properties and/or easements.

b. If water must be carried across or discharged onto Metropolitan's fee properties and/or easements, Metropolitan will insist that plans for development provide that it be carried by closed conduit or lined open channel approved in writing by Metropolitan. Also the drainage facilities must be maintained by others, e.g., city, county, homeowners association, etc. If the development proposes changes to existing drainage features, then the developer shall make provisions to provide for replacement and these changes must be approved by Metropolitan in writing.

11. Construction Coordination

During construction, Metropolitan's field representative will make periodic inspections. We request that a stipulation be added to the plans or specifications for notification of Mr. _____ of Metropolitan's Operations Services Branch, telephone (213) 250-____, at least two working days prior to any work in the vicinity of our facilities.

12. Pipeline Loading Restrictions

a. Metropolitan's pipelines and conduits vary in structural strength, and some are not adequate for AASHTO H-20 loading. Therefore, specific loads over the specific sections of pipe or conduit must be reviewed and approved by Metropolitan. However, Metropolitan's pipelines are typically adequate for AASHTO H-20 loading provided that the cover over the pipeline is not less than four feet or the cover is not substantially increased. If the temporary cover over the pipeline during construction is between three and four feet, equipment must restricted to that which

2. Response to Comments

imposes loads no greater than AASHTO H-10. If the cover is between two and three feet, equipment must be restricted to that of a Caterpillar D-4 tract-type tractor. If the cover is less than two feet, only hand equipment may be used. Also, if the contractor plans to use any equipment over Metropolitan's pipeline which will impose loads greater than AASHTO H-20, it will be necessary to submit the specifications of such equipment for our review and approval at least one week prior to its use. More restrictive requirements may apply to the loading guideline over the San Diego Pipelines 1 and 2, portions of the Orange County Feeder, and the Colorado River Aqueduct. Please contact us for loading restrictions on all of Metropolitan's pipelines and conduits.

b. The existing cover over the pipeline shall be maintained unless Metropolitan determines that proposed changes do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance.

13. Blasting

a. At least 20 days prior to the start of any drilling for rock excavation blasting, or any blasting, in the vicinity of Metropolitan's facilities, a two-part preliminary conceptual plan shall be submitted to Metropolitan as follows:

b. Part 1 of the conceptual plan shall include a complete summary of proposed transportation, handling, storage, and use of explosions.

c. Part 2 shall include the proposed general concept for blasting, including controlled blasting techniques and controls of noise, fly rock, airblast, and ground vibration.

14. CEQA Requirements

a. When Environmental Documents Have Not Been Prepared

1) Regulations implementing the California Environmental Quality Act (CEQA) require that Metropolitan have an opportunity to consult with the agency or consultants preparing any environmental documentation. We are required to review and consider the environmental effects of the project as shown in the Negative Declaration or Environmental Impact Report (EIR) prepared for your project before committing Metropolitan to approve your request.

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2) In order to ensure compliance with the regulations implementing CEQA where Metropolitan is not the Lead Agency, the following minimum procedures to ensure compliance with the Act have been established:

a) Metropolitan shall be timely advised of any determination that a Categorical Exemption applies to the project. The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

b) Metropolitan is to be consulted during the preparation of the Negative Declaration or EIR.

c) Metropolitan is to review and submit any necessary comments on the Negative Declaration or draft EIR.

d) Metropolitan is to be indemnified for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

b. When Environmental Documents Have Been Prepared

If environmental documents have been prepared for your project, please furnish us a copy for our review and files in a timely manner so that we may have sufficient time to review and comment. The following steps must also be accomplished:

1) The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

2) You must agree to indemnify Metropolitan, its officers, engineers, and agents for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

15. Metropolitan's Plan-Review Cost

a. An engineering review of your proposed facilities and developments and the preparation of a letter response

2. Response to Comments

giving Metropolitan's comments, requirements and/or approval that will require 8 man-hours or less of effort is typically performed at no cost to the developer, unless a facility must be modified where Metropolitan has superior rights. If an engineering review and letter response requires more than 8 man-hours of effort by Metropolitan to determine if the proposed facility or development is compatible with its facilities, or if modifications to Metropolitan's manhole(s) or other facilities will be required, then all of Metropolitan's costs associated with the project must be paid by the developer, unless the developer has superior rights.

b. A deposit of funds will be required from the developer before Metropolitan can begin its detailed engineering plan review that will exceed 8 hours. The amount of the required deposit will be determined after a cursory review of the plans for the proposed development.

c. Metropolitan's final billing will be based on actual cost incurred, and will include engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount. Additional deposits may be required if the cost of Metropolitan's review exceeds the amount of the initial deposit.

16. Caution

We advise you that Metropolitan's plan reviews and responses are based upon information available to Metropolitan which was prepared by or on behalf of Metropolitan for general record purposes only. Such information may not be sufficiently detailed or accurate for your purposes. No warranty of any kind, either express or implied, is attached to the information therein conveyed as to its accuracy, and no inference should be drawn from Metropolitan's failure to comment on any aspect of your project. You are therefore cautioned to make such surveys and other field investigations as you may deem prudent to assure yourself that any plans for your project are correct.

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17. Additional Information

Should you require additional information, please contact:

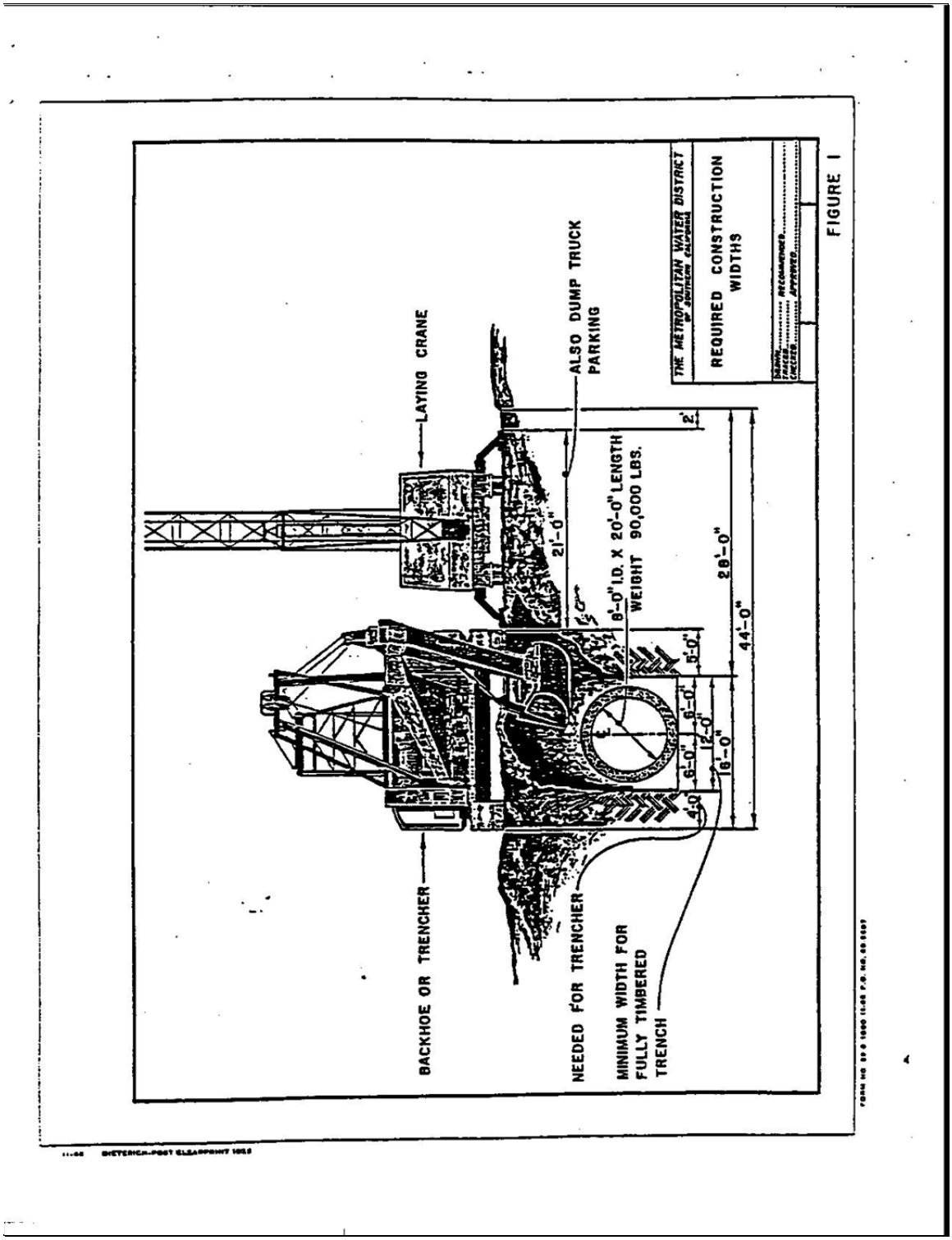
Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213) 217-6000

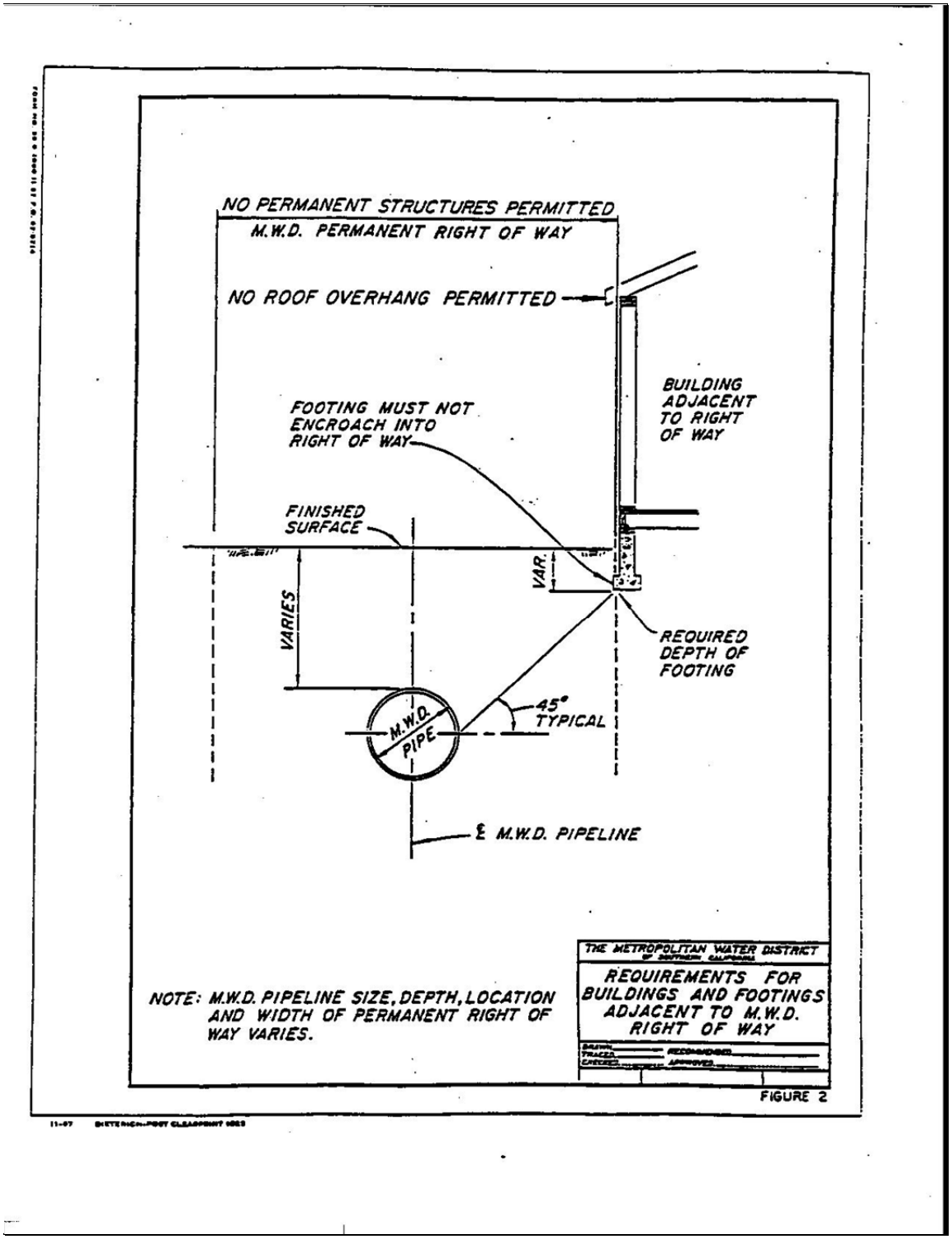
JEH/MRW/lk

Rev. January 22, 1989

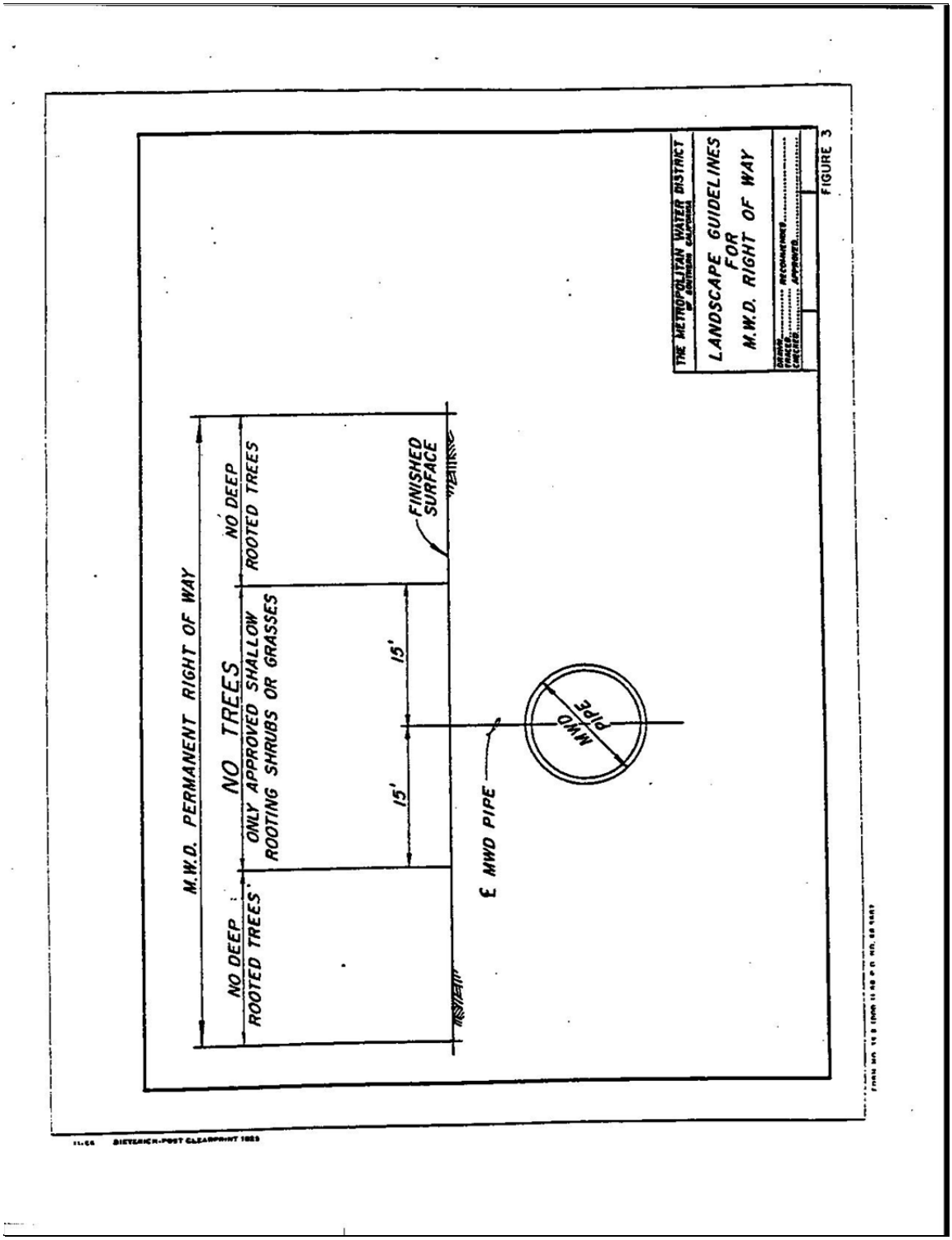
Encl.

2. Response to Comments

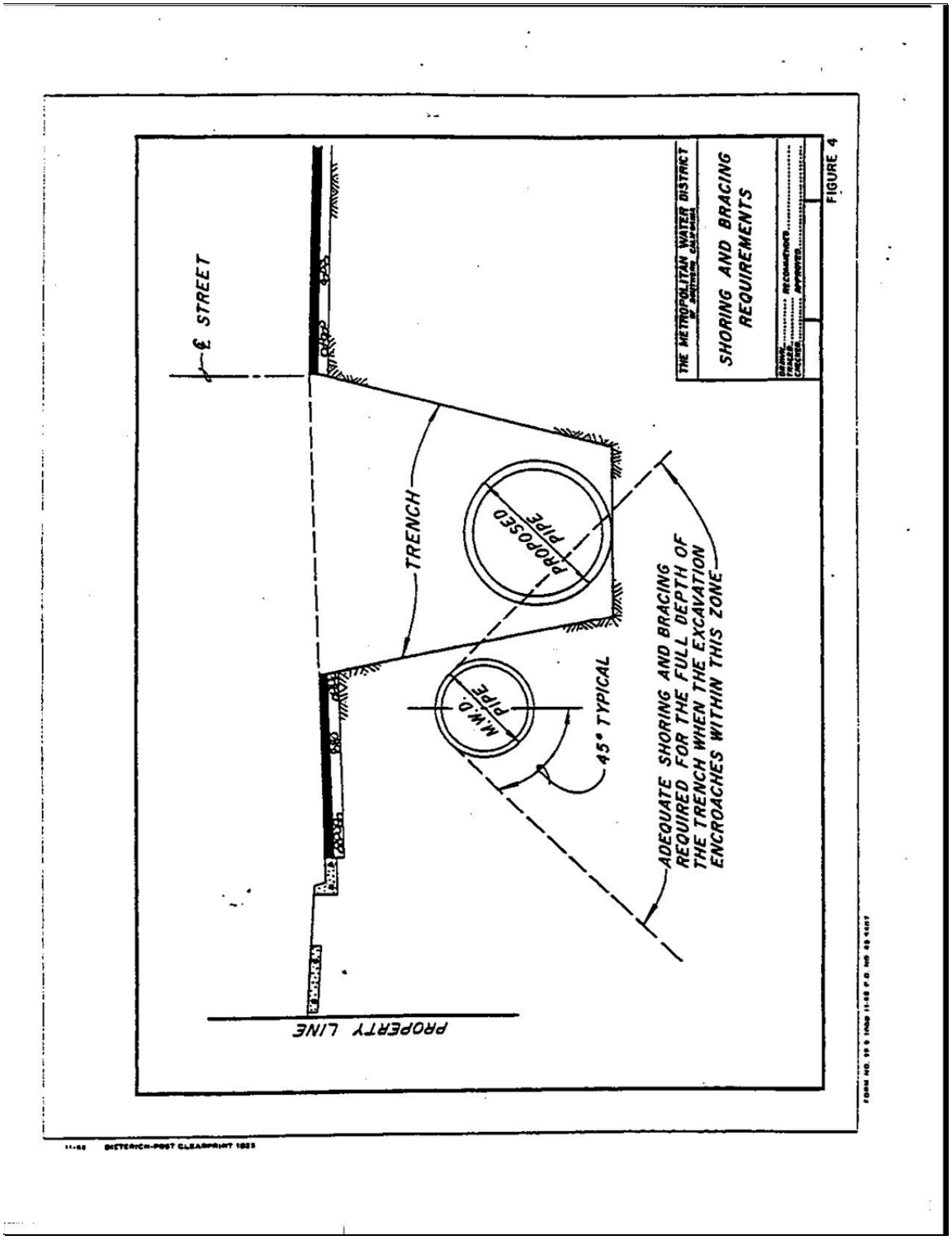



NO PERMANENT STRUCTURES PERMITTED
M.W.D. PERMANENT RIGHT OF WAY
NO ROOF OVERHANG PERMITTED
BUILDING ADJACENT TO RIGHT OF WAY
FOOTING MUST NOT ENCROACH INTO RIGHT OF WAY
FINISHED SURFACE
VAR.
VARIES
REQUIRED DEPTH OF FOOTING
45° TYPICAL
M.W.D. PIPE
℄ M.W.D. PIPELINE
NOTE: M.W.D. PIPELINE SIZE, DEPTH, LOCATION AND WIDTH OF PERMANENT RIGHT OF WAY VARIES.
THE METROPOLITAN WATER DISTRICT
REQUIREMENTS FOR BUILDINGS AND FOOTINGS ADJACENT TO M.W.D. RIGHT OF WAY
FIGURE 2

2. Response to Comments



2. Response to Comments



2. Response to Comments

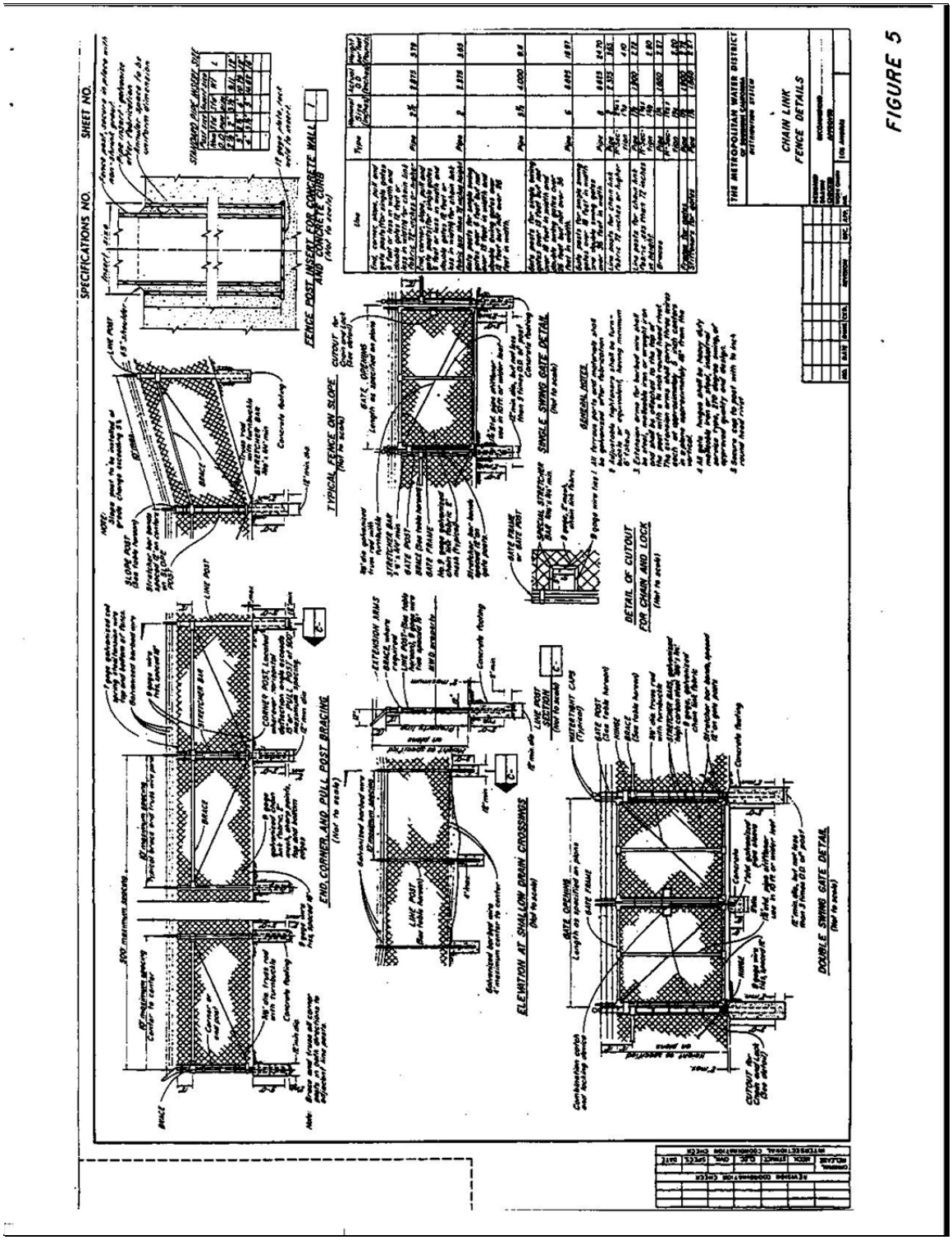
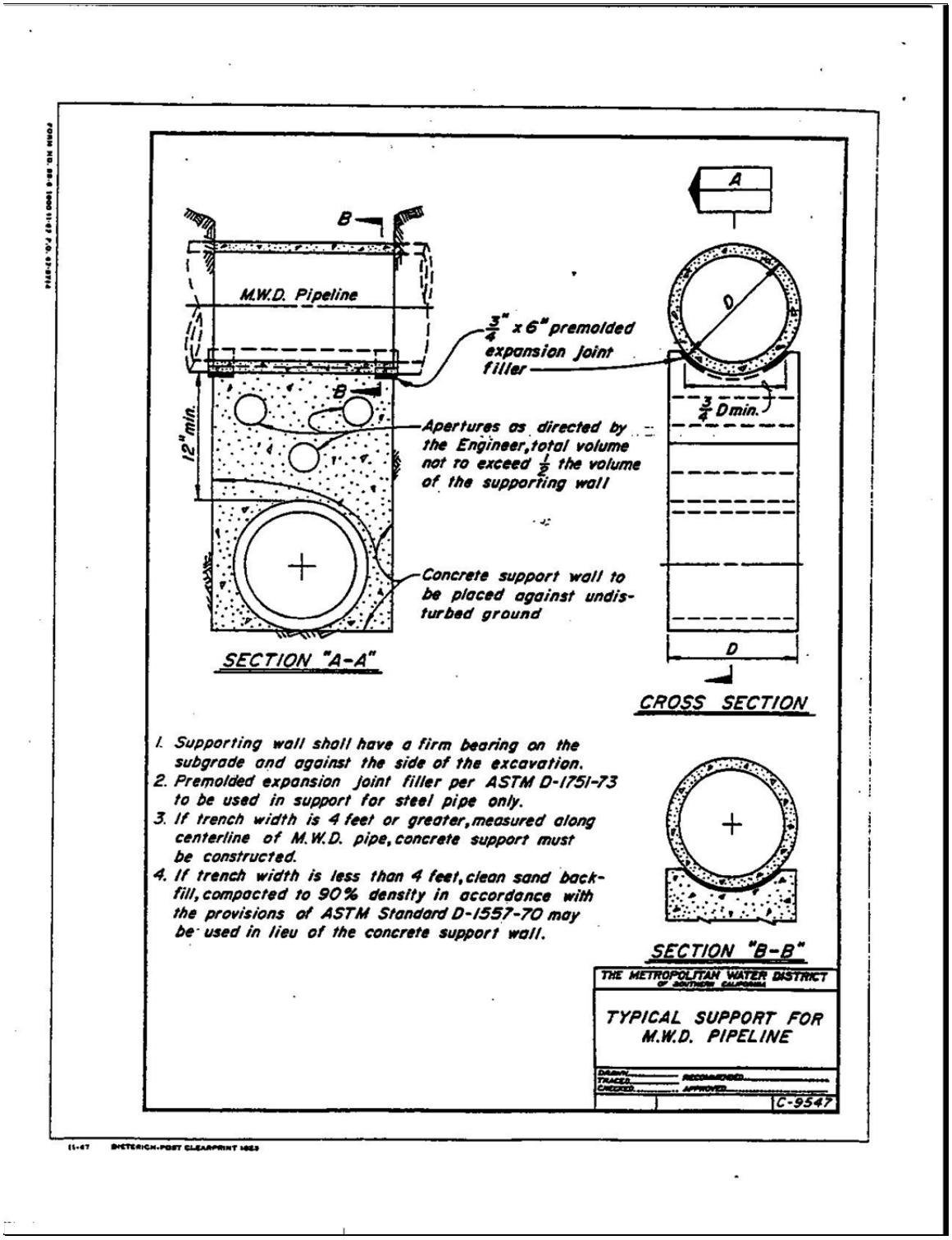
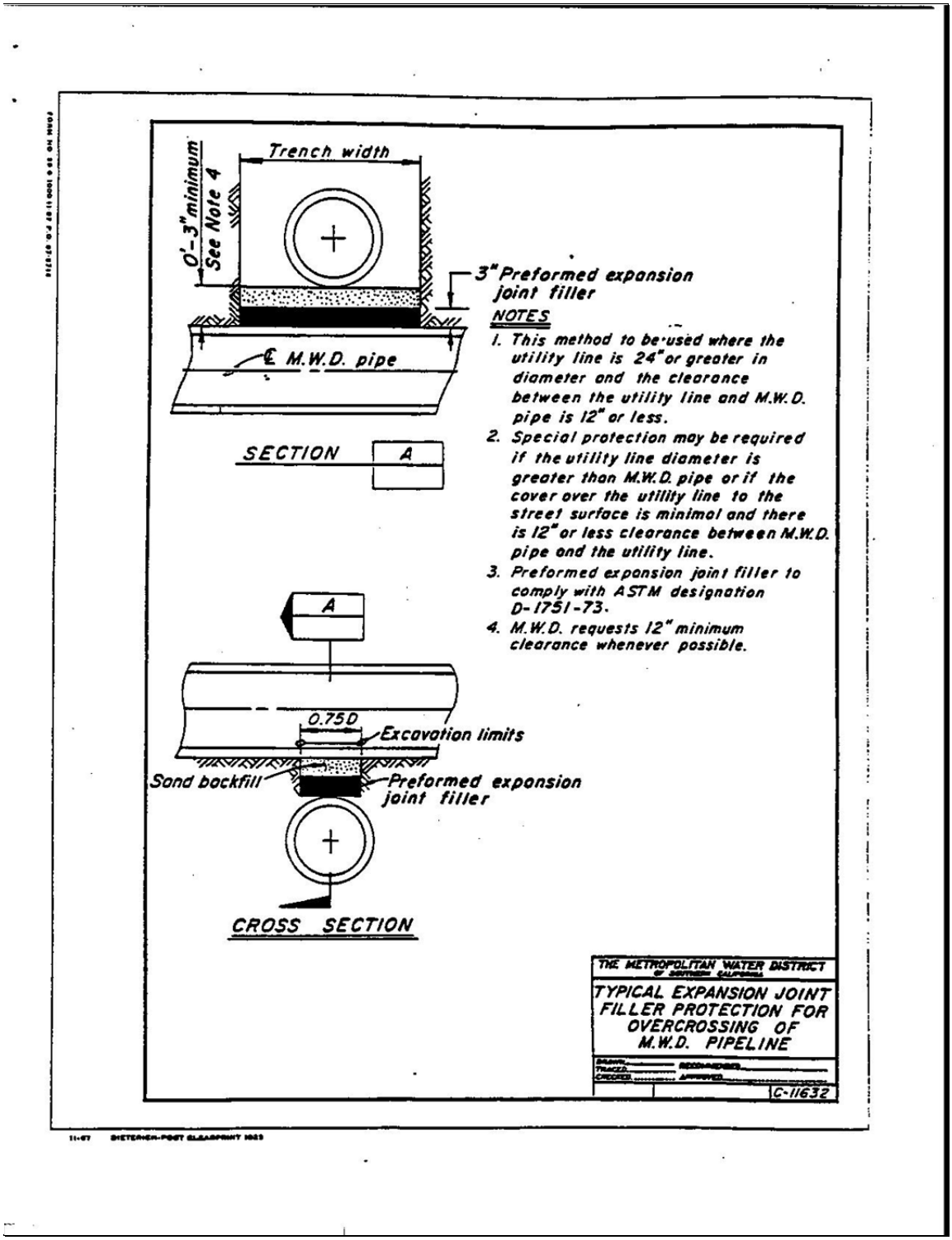


FIGURE 5


B
M.W.D. Pipeline
3/4" x 6" premolded expansion joint filler
B
12" min.
Apertures as directed by the Engineer, total volume not to exceed 1/2 the volume of the supporting wall
Concrete support wall to be placed against undisturbed ground
SECTION "A-A"
A
D
3/4 D min.
D
CROSS SECTION
1. Supporting wall shall have a firm bearing on the subgrade and against the side of the excavation.
2. Premolded expansion joint filler per ASTM D-1751-73 to be used in support for steel pipe only.
3. If trench width is 4 feet or greater, measured along centerline of M.W.D. pipe, concrete support must be constructed.
4. If trench width is less than 4 feet, clean sand backfill, compacted to 90% density in accordance with the provisions of ASTM Standard D-1557-70 may be used in lieu of the concrete support wall.
SECTION "B-B"
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
TYPICAL SUPPORT FOR M.W.D. PIPELINE
DRAWN
TRACED
CHECKED
RECOMMENDED
APPROVED
C-9547

2. Response to Comments



A9. Response to comments from Deidre West, Metropolitan Water District of California, dated October 6, 2014.

A9-1 The Proposed Project consists of an update to the Adopted Area Plan, which is the long-range planning document for the northern portion of unincorporated County. As a result, no actual development is proposed at this time. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

2. Response to Comments

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LETTER A10 – Governor's Office of Planning and Research (2 pages)

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

October 7, 2014

Carl Nadela
Los Angeles County
320 West Temple St.
Los Angeles, CA 90012

Subject: Antelope Valley Areawide General Plan Update
SCH#: 2014061043

Dear Carl Nadela:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 6, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

A10-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

RECEIVED
OCT 15 2014
BY:

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

2. Response to Comments

Document Details Report
State Clearinghouse Data Base

SCH#	2014061043
Project Title	Antelope Valley Areawide General Plan Update
Lead Agency	Los Angeles County

Type	EIR Draft EIR
Description	The proposed project is a comprehensive update of the Antelope Valley Area Plan. The project includes goals, policies, implementing programs and ordinances. The project covers the unincorporated areas of the Antelope Valley in Los Angeles County and identifies 1) Rural Preserve Areas, where important ecological and agricultural resources will be preserved; 2) Rural Town Areas, where rural character will be protected; 3) Rural Town Centers, where urban commercial uses will be discouraged but rural commercial uses will be incentivized; and 4) Economic Opportunity Areas, where plans for major infrastructure development are underway that necessitate the need for more detailed planning activities in these areas to determine any appropriate land use and zoning changes needed when these infrastructure projects are completed.

Lead Agency Contact

Name	Carl Nadela		
Agency	Los Angeles County		
Phone	213 974 6476	*Fax*	
email			
Address	320 West Temple St.		
City	Los Angeles	*State* CA	*Zip* 90012

Project Location

County	Los Angeles
City	
Region	
Lat / Long	34° 41' 53" N / 118° 8' 8" W
Cross Streets	certain portions of the CA-14 Freeway and CA-138
Parcel No.	multiple
Township	*Range* *Section* *Base*

Proximity to:

Highways	Hwy 138, 14
Airports	Palmdale, Fox Field, others
Railways	Metrolink others
Waterways	CA Aqueduct, Littlerock Wash, Big Rock Wash, others
Schools	multiple
Land Use	multiple

Project Issues	Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects
Reviewing Agencies	Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Cal Fire; Department of Parks and Recreation; Office of Emergency Services, California; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Air Resources Board; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received 08/22/2014 *Start of Review* 08/22/2014 *End of Review* 10/06/2014

A10. Response to comments from Scott Morgan, Governor's Office of Planning and Research, dated October 7, 2014.

A10-1 The State Clearinghouse forwarded correspondence from the CDFW. Refer to Letter A7 in this FEIR for responses to comments received from CDFW. No additional response is necessary.

2. Response to Comments

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LETTER R1 – Granite Construction (3 pages)

GRANITE™

Palmdale Area Office
213 East Avenue M
Lancaster, CA 93535

Phone: 661.726.4447
Main Fax: 661.726.4460

www.graniteconstruction.com

September 23, 2014

Carl Nadela,
Department of Regional Planning
320 West Temple St, Room 1354
Los Angeles, CA 90012
Fax: (213) 626-0434
Email: tnc@planning.lacounty.gov

sent via e-mail and US Mail

RE: Antelope Valley Area Plan Update (Town and Country)

Dear Mr. Nadela,

Granite Construction Company (Granite) is a full-service general contractor, construction management firm, and construction materials producer operating in Los Angeles County (County). We specialize in heavy civil and other complex infrastructure projects serving the transportation, industrial, and federal markets. Granite has permitted sand and gravel operations serving the Antelope Valley. These facility produce the aggregate materials (such as road base and asphalt paving materials) used by civil contractors, including ourselves, with the materials needed to build and maintain the roads, highways, and other public infrastructure in the County.

Granite is pleased to provide the below comments on the Town and County Plan Update and Draft Environmental Impact Report.

We note that Policy COS 8:1 of the Antelope Valley Area Plan update (quoted below) does not encourage the development of locally sourced aggregate materials, nor does it provides for the inclusion of new mineral designated areas or zones when identified by the State of California.

> **Chapter 4 Conservation and Open Space Element II - Goals and Policies Natural Resources – Mineral Resources**
>
> Policy COS 8:1: Allow new mineral resource extraction activities in only designated Mineral Resource Areas:

R1-1

While we applaud the recognition of Mineral Resource Areas, Granite notes that in Public Resource Code Section 2711 (d-f), the State of California encourages a broader approach which favors locally sourced aggregate:

> *(d) The Legislature further finds that the production and development of local mineral resources that help maintain a strong economy and that are necessary to build the state's infrastructure are vital to reducing transportation emissions that result from the distribution of hundreds of millions of tons of construction aggregates that are used annually in building and maintaining the state.*

2. Response to Comments

(e) The Legislature further finds and recognizes the need of the state to provide local governments, metropolitan planning organizations, and other relevant planning agencies with the information necessary to identify and protect mineral resources within general plans.

(f) The Legislature further finds that the state's mineral resources are vital, finite, and important natural resources and the responsible protection and development of these mineral resources is vital to a sustainable California.

Locally sourced aggregate materials provide many economic and environmental benefits over imported materials, including benefits to the economy and environment such as:

- Reduced construction costs due to short haul distances,
- Reduced greenhouse gas emissions associated with trucking distances,
- Reduced road congestion associated with material hauling,
- Reduced road pavement deterioration from heavy truck traffic, and
- Increased local employment

Granite strongly encourages the following additional policies be included in the mineral resources section of the Town & Country's Antelope Valley Plan.

Granite request that Chapter 4 Conservation and Open Space Element II - Goals and Policies Natural Resources – Mineral Resources of Antelope Valley Area Plan be modified to include the following policy goals:

R1-1 cont'd

- Policy C/NR 10.1: Protect MRZ-2's and access to MRZ-2s from development and discourage incompatible adjacent land uses.

- Policy C/NR 10.2: prior to permitting a use that would threaten the potential to extract minerals in an identified Mineral Resource Zone, the county shall prepare a statement specifying its reasons for permitting the proposed use, and shall forward a copy to the State Geologist and the board for review in accordance with Public Resources Code subsections 2762 and 2763 as applicable.

- Policy C/NR 10.3: Recognize newly identified MRZ-2s within 12 months of transmittal of information by State Mining and Geology Board.

- Policy C/NR 10.4: Work collaboratively with agencies to identify Mineral Resource Zones and to prioritize mineral land use classifications in regional efforts.

- Policy C/NR 10.5: Manage mineral resources in a manner that effectively plans for the access to, and the development and conservation of mineral resources for existing and future generations.

We note these policy goals are already included as part of the County's General Plan update. Additionally, these requested changes will encourage sustainable planning practices by encouraging the development and use of locally sourced aggregate materials resulting in reduced impacts associated

with importing aggregate materials long distances while additionally aligning the Antelope Valley Area Plan update with State wide goals and policy requirements. R1-1 cont'd

Please feel free to contact me at (661) 387-7735 or william.taylor@gcinc.com to further discuss our request and concerns.

Sincerely,

Bill Taylor
Resource Development Project Manager
Granite Construction Company

2. Response to Comments

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R1. Response to comments from Bill Taylor, Granite Construction, dated September 23, 2014.

R1-1 Suggested Policies C/NR 10.2 and 10.3 are already existing State requirements. This language is already included in the Draft County of Los Angeles General Plan. Stating this again at the Area Plan level would be unnecessarily redundant. However, per your request, the other suggested policies have been added to the updated Proposed Area Plan, as follows:

- **Policy COS 8.4:** Protect MRZ-2's and access to MRZ-2's in the Antelope Valley from incompatible development and discourage incompatible adjacent land uses.
- **Policy COS 8.5:** Work collaboratively with agencies to identify Mineral Resource Zones in the Antelope Valley and to prioritize mineral land use classifications in regional efforts.
- **Policy COS 8.6:** Manage mineral resources in the Antelope Valley in a manner that effectively plans for the access to, and the development and conservation of mineral resources for existing and future generations.

2. Response to Comments

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LETTER R2 – Eric Roy Anderson (3 pages)

AV DEIR response: Aesthetics

California Scenic Highway Program.

In looking thru the DEIR section on Aesthetics, we find that only a small portion of our local Highways are in the **California Scenic Highway Program.** What a mistake. Shame on us. Route 5, from Castaic to Grapevine is full of beautiful and scenic views, changing during the year. It includes huge wildflower displays and snowy peaks and it absolutely should be included in this designation. This would be a wise move to protect those views before they disappear. We would also include Route 118, especially between Route 5 and Neenach, as a Highway to be included in this program. What better way to preserve these rural views? Isn't this what the DEIR is about? Preserving the rural character of the area? R2-1

We would suggest as part of the county planning effort, a community driven and government coordinated plan to include the aforementioned highways in the **California Scenic Highway Program. The Tri-County Watchdogs** would like to partner with interested groups and area property holders in making this happen.

Glare

We have a Dark Skies ordinance here in Kern County, and it covers new construction. However, what is needed is an a method to enforce these ordinances through a county agency. Existing violations need to be addressed. Please include that mechanism in the DEIR. R2-2

Mitigation Measures

Why are there no mitigation measures in the DEIR for aesthetics. Why? We would ask that working to include area highways in the Scenic Highway Program would be an excellent mitigation for the proposed development in this plan. A mechanism for addressing exisitng Glare and Flare violations would be another excellent Mitigation Measure. R2-3

SEA

In looking at the **Proposed West Economic Opportunity Area**, we feel that this is a mistake in zoning. It is in direct opposition to Policies LU 1.1, LU 2.2 and ED 1.6. (See below)

You are encouraging development in an area that contains an SEA and magnificent view corridors. R2-4

We also feel that the DEIR makes many assumptions about the SEA areas, but does not discuss their future changes. **The areas that are in, or next to, an SEA should**

2. Response to Comments

not be included in any zoning designations until the SEA changes are publicly vetted in an EIR and a CEQUA review.

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.

West Economic Opportunity Area

- Policy LU 1.1: Direct the majority of the unincorporated Antelope Valley's future growth to rural town center areas, rural town areas, and identified economic opportunity areas.

R2-4 cont'd

Policy LU 2.1: 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.

- Policy ED 1.16: Preserve the scenic resources of the Antelope Valley, including Scenic Drives, Significant Ridgelines and Significant Ecological Areas, in such a way that can contribute to the economic activities in the area.

AV DEIR Aesthetics (Additional Comments)

Change Highway 118 to 138

Add: Please fit these in where appropriate

Aesthetics:

Poppies and Wildflower fields are visible throughout the Antelope Valley in the Springtime, not just in the Poppy Preserve. We did not see any mention of the seasonal wildflowers in Chapter 5.01: Aesthetics. R2-5

Ecotourism.

Tourism (eco tourism,) our most viable creator of future jobs and prosperity, will be negatively impacted by the visual blight of a Castaic type sprawl in the Antelope Valley. Who will drive up into the our area if all they can see from the 5 freeway and Route 138 are subdivisions and warehouses? Who will bother to drive into towns like Neenach or Frazier Park to shop, dine, and browse if all their needs can be satisfied in Lebec? R2-6

We did not see anywhere in the DEIR a mitigation fund to offset the loss of tourism dollars to the Local Communities.

Tri-County Watchdogs would recommend developers pay into a fund that will be used to mitigate light pollution in the project area.

2. Response to Comments

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R2. Response to comments from Eric Roy Anderson datedOctober 7, 2014.

R2-1 Please refer to Section 5.1, Aesthetics, of the DEIR for a discussion of the visual impacts of the Proposed Project. Although the State Scenic Highways program is a State program, the County has designated I-5 and SR-138 as Scenic Drives in the Proposed Area Plan. SR-118 is not located within the Project Area and is therefore not addressed in the Proposed Area Plan.

R2-2 All future development within the Project Area will be required to comply with all existing County codes and ordinances, including the Rural Outdoor Lighting District ("Dark Skies") ordinance. Although not related to the Proposed Project, existing code violations should be reported to the County for enforcement.

R2-3 As discussed in Section 5.1, *Aesthetics,* of the DEIR, upon implementation of regulatory requirements, program-level aesthetic impacts, including Impacts 5.1-1 through 5.1-5, would be less than significant. However, as future development applications are submitted, additional environmental review will be required. If significant aesthetic impacts are identified, project-level mitigation measures will be required to address potential impacts.

R2-4 As discussed in Chapter 3, *Project Description,* of the DEIR expansion of the existing SEA boundaries within the Project Area is part of the Proposed Project. While update to the existing SEA Ordinance is not part of the Proposed Project, it is being considered as part of the comprehensive revision to the 1980 Countywide General Plan. As a result, the DEIR analyzes biological impacts based on the expanded SEA boundaries proposed as part of the Project, and considers impacts under the existing SEA Ordinance as well as the Proposed SEA Ordinance. As a result, the Proposed Project can proceed prior to adoption of the Proposed SEA Ordinance.

R2-5 Section 5.1, Aesthetics, of the DEIR acknowledges that flora creates distinctive scenic views in the Project Area in addition to the importance of the Antelope Valley California Poppy Preserve as a scenic resource (see Page 5.1-8). No additional changes to the DEIR are necessary. However, your comment is hereby noted and will be forwarded to the appropriate County decision makers for their review and consideration.

R2-6 CEQA requires analysis and mitigation for physical environmental impacts, not economic "impacts." (CEQA Guidelines §15382) As a result, potential economic impacts of the Proposed Project are not discussed in the DEIR. However, your comment is hereby noted and will be forwarded to the appropriate County of decision makers for their review and consideration.

2. Response to Comments

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3. Revisions to the Draft EIR

3.1 INTRODUCTION

This section contains revisions to the DEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DEIR publication; and/or (3) typographical errors. This section also includes additional mitigation measures to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements included in the DEIR. The provision of these additional mitigation measures does not alter any impact significance conclusions as disclosed in the DEIR. Changes made to the DEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

3.2 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the DEIR.

Table 1-2, Page 1-14, Chapter 1, *Executive Summary*, is hereby modified to include the following information:

Table 1-2 Summary of NOP Comments

Commenting Agency/Person	Comment Type	Comment Summary	Issue Addressed In:
Organizations			
Three Points-Liebre Mountain Town Council	Aesthetics; Agriculture and Forestry Resources; Air Quality/Greenhouse Gas Emissions; Biological Resources; Economics/Jobs; Hazards and Hazardous Materials; Hydrology/Water Quality; Noise; Land Use; Utilities and Service Systems;	• Requests analysis of impacts to aesthetics due to development along scenic roadways • Requests consideration of impacts to agricultural areas due to renewable energy projects and impacts to forestry resources due to development • Requests analysis of impacts related to air quality and GHG emissions due to increased development; impacts related to Valley Fever • Requests analysis of impacts biological resources, including wildlife corridors. • Requests analysis of economic impacts related to increased industrial development • Requests analysis of impacts related to increased hazards from flooding and fire hazards • Requests analysis of impacts to water supply • Requests analysis of impacts related to noise from increased vehicle and truck traffic • Requests analysis of land use impacts associated with the proposed goals and policies	Sections 5.1, *Aesthetics*, 5.2, *Agriculture and Forestry Resources*, 5.3, *Air Quality*, 5.4, *Biological Resources*, 5.6, *Geology and Soils*, 5.7, *Biological Resources*, 5.8, *Hazards and Hazardous Materials*, 5.9, *Hydrology and Water Quality* 5.10, *Land Use and Planning*, 5.12, *Noise*, 5.13, *Population and Housing*, and 5.17, *Utilities and Service Systems.*

3. Revisions to the Draft EIR

Table 1-2 Summary of NOP Comments

Commenting Agency/Person	Comment Type	Comment Summary	Issue Addressed In:
		and Economic Opportunity Areas (EOAs)	

Page 5.4-25, Section 5.4, *Biological Resources*, is hereby modified as follows:

Wildlife

These habitats support diverse sedentary and migratory bird species. Typical species include the mourning dove (*Zenaidamacroura*), greater roadrunner (*Geococcyxcalifornianus*), lesser nighthawk (*Chordeilesacutipennis*), western kingbird (*Tyrannusverticalis*), common raven (*Corvuscorax*), horned lark (*Eremophilaalpestris*), rock wren (*Salpinctesobsoletus*), Le Conte's thrasher (*Toxostomalecontei*), and sage sparrow (*Artemisiospiza belli*). The region supports a diverse resident and seasonal list of raptoral species, some of which are increasingly rare, such as the burrowing owl (*Athenecunicularia*), golden eagle (*Aquila chrysaetos*), prairie falcon (*Falco mexicanus*), and rough-legged hawk (*Buteolagopus*). The Audubon Society has designated two Globally Important Bird Areas (IBAs) in the Plan Area: the Antelope Valley (Lancaster) IBA (326,296 acres) and the Edwards Air Force base IBA (295,883 acres). IBAs are areas recognized as being globally important habitat for the conservation of bird populations.

Page 5.4-78, Section 5.4, *Biological Resources*, is hereby modified as follows:

Nonetheless, buildout of the Proposed Project will result in impacts to various habitat types, which will result in the loss of special-status species through direct mortality, habitat loss, and edge effects at the urban-wildland interface. In addition, wind energy projects could be allowed within various industrial and rural designations in the Project Area. Wind farms can result in higher mortality of sensitive raptoral birds such as the golden eagle, Swainson's hawk, sensitive bat species, and indeed any bird or bat species that occurs in the area, as a result of collision with wind turbines.As a consequence, buildout of the Proposed Project will have a significant adverse effect on special-status species.

Page 5.4-80, Section 5.4, *Biological Resources*, is hereby modified as follows:

Impact Analysis:The Project Area contains ~~16~~ 27 sensitive natural plant communities identified in the CNDDB, including canyon live oak ravine forest, Mojave riparian forest, Riversidean alluvial fan sage scrub, coastal sage scrub, walnut woodland,southern coast live oak riparian forest, southern cottonwood-willow riparian forest, southern mixed riparian forest, southern riparian forest, southern riparian scrub, southern sycamore alder riparian woodland, southern willow scrub, valley needlegrass grassland, valley oak woodland, wildflower field, vernal pool, Southern California arroyo chub/Santa Ana sucker stream, ~~and~~ Southern California threespine stickleback stream, and nine seasonal wetland and marsh plant communities (freshwater marsh, alkali meadow, alkali marsh, alkali sink scrub, alkali playas, freshwater seeps, vernal pools, ephemeral ponds, and montane meadows). Several of the sensitive woodland plant communities occur primarily in the

mountainous parts of the Project Area, which are under the jurisdiction of the Angeles and Los Padres national forests. Development (residential, commercial, industrial, and public/institutional) that would occur under the Proposed Project would occur primarily in the Antelope Valley, and to a much smaller extent in the San Gabriel Mountains part of the Project Area. The Proposed Project would allow low density residential development on private in-holdings within the national forests (typically one dwelling unit per 10 acres) and limited commercial/recreational development. The Proposed Area Plan would not affect land use within Edwards Air Force Base.

Pages 5.7-35 and 5.7-36, Section 5.7, *Greenhouse Gas Emissions*, is hereby modified as follows:

GHG-1 The County of Los Angeles shall include the following additional implementation actions, consistent with the CCAP measures drafted in the Final Unincorporated Los Angeles County Community Climate Action Plan 2020, in the Antelope Valley Area Plan Implementation Plan (Chapter 8) to ensure progress toward meeting the long-term GHG reduction goals of Executive Order S-03-05:

<u>The County shall further research to determine the feasibility, and as appropriate propose amendments to the County Code, for the following:</u>

- Require new residential and now residential buildings within the Antelope Valley Area Plan to achieve the Tier 1 energy standards within the California Green Building Standards Code (Title 24, Part 11). The voluntary Tier 1 CALGreen requires a 15 percent increase in energy efficiency compared to the Building and Energy Efficiency Standards (Title 24, Part 6). Architectural building plans shall be submitted to the County that identify features that achieve the Tier 1 energy standards (corresponding CCAP Measure BE-1).
- Require that new residential and non-residential building be constructed to accommodate roof-top solar installation. Architectural building plans shall be submitted to the County <u>that</u> shall identify this requirement (corresponding CCAP Measure BE-3).
- Prior to isusance of building permits for new construction of non-residential development of 100,000 building square feet or more within the Antelope Valley Area Plan, the applicant shall identify bicycle end-trip facilities, including bike parking and lockers. The location of the bicycle storage shall be specified on site plans and verified by Department of Regional Planning prior to building permit issuance (corresponding CCAP Measure LUT-1).
- Require installation of Level 2 (240 volt) electric vehicle (EV) charging facilities at County-owned public venues (e.g., hospitals, beaches, stand-alone parking facilities, cultural institutions, and other facilities) within the Antelope Valley Area Plan and ensure that at least one-third of these charging stations will be available for visitor use (corresponding CCAP Measure LUT-8).

GHG-2 The County of Los Angeles shall include the following additional implementation actions in the Antelope Valley Area Plan Implementation Plan (Chapter 8) to ensure progress toward meeting the long-term GHG reduction goals of Executive Order S-03-05:

The County shall further research to determine the feasibility, and as appropriate propose amendments to the County Code, for the following:

- Prior to issuance of building permits for new construction of residential development, the property owner/developer shall indicate on plans that garage and/or car port parking are electrically wired to accommodate a Level 2 (240 volt) EV charging. The location of the electrical outlets shall be specified on building plans, and proper installation shall be verified by Department of Public Works prior to issuance of a Certificate of Occupancy.
- Prior to issuance of building permits for new construction of non-residential development of 100,000 building square feet or more within the Antelope Valley Area Plan, the applicant shall indicate on plans that at minimum, 10 Level 2 EV vehicle charging stations will be provided for public use. The location of the EV station(s) shall be specified on building plans, and proper installation shall be verified by the Department of Public Works prior to issuance of a Certificate of Occupancy.
- The County of Los Angeles shall require applicants of new residential developments to consider installation of gray water systems for resident use.
- The County of Los Angeles shall require applicants of non-residential developments of 100,000 building square feet or more, to coordinate with the Antelope Valley Transit Authority for the installation of additional bus shelters and transit stops as feasible.

3.3 ADDITIONAL DEIR REVISIONS

The following text has been revised to update information or correct errors.

Page 4-13, Section 4, *Environmental Setting*, is hereby modified as follows:

The County has the largest solid waste management system in the country. In 2012, ~~T~~there ~~are~~ were seven major solid waste landfills, four minor solid waste landfills and two waste-to-energy facilities in Los Angeles County. In 2012, the County generated, on average, approximately 59,000 tons per day (tpd) of solid waste. Assembly Bill 939, also known as the California Integrated Waste Management Act of 1989, mandates local jurisdictions to meet a diversion goal of 50 percent by 2000 and thereafter. Major issues identified with respect to solid waste include 1) the growing amounts of waste being generated and disposed of; 2) a shortage of solid waste processing facilities; 3) strong public opposition for new solid waste management facilities; 4) promoting alternative technologies; and 5) trash hauling. Most solid waste generated in the Project

Area is disposed at the Antelope Valley Public Landfill in Palmdale and the Lancaster Landfill and Recycling Center in Lancaster.

Page 5.2-21, Section 5.2, *Agriculture and Forestry Resources*, is hereby modified as follows:

Increasing water demands in a region can ~~reduce~~ change the practicability and/or economic feasibility of commercial agriculture. The two foremost sources of water in the Antelope Valley are local groundwater and water imported from Northern California via the State Water Project (SWP). The Antelope Valley-East Kern Water Agency (AVEK), the largest water wholesaler in the Antelope Valley region, purchases imported water and resells it to the local water providers. The native safe yield of the Antelope Valley Groundwater Basin is 82,300 acre-feet per year (afy). The SWP water brought in the Antelope Valley results in return flows. The supplemental yield from imported water return flows and the native safe yield of 82,300 provide an average total of 110,000 afy. See Section 5.17 for additional information pertaining to availability of water supplies.

Page 5.3-25, Section 5.3, *Air Quality*, is hereby modified as follows:

Indicator 2

AVAQMD and SCAQMD consider a project consistent with the air quality management plan if it is consistent with the existing land use plan. Zoning changes, specific plans, general plan amendments, and similar land use plan changes that do not increase dwelling unit density, vehicle trips, or vehicle miles traveled are deemed to not exceed this threshold (SCAQMD 1993; AVAQMD 2011). SCAG projections for the Project Area are partially based on the Adopted Area Plan within the 2012 RTP/SCS. The horizon year for the 2012 RTP/SCS is 2035. Table 5.3-10 compares the population, employment, and daily VMT generation of the Proposed Project compared to the population, employment, and daily VMT generation of the Adopted Area Plan, which is used for regional air quality management planning. As shown in Table 5.3-10, *Comparison of Population, Employment, and VMT Forecasts*, buildout of the Proposed Project would result in ~~higher~~ a lower population and generate more employment for the Project Area than SCAG forecasts. Overall, the "service population" (residents plus employees) of the Project Area and its associated VMT would be lower under the Proposed Project.

3. Revisions to the Draft EIR

Page 5.3-31, Section 5.3, *Air Quality*, and Table 1-3 in Chapter 1, *Executive Summary*, is hereby modified as follows:

Impact 5.3-4: Buildout of the Proposed Project could result in new ~~source~~ sources of criteria air pollutant emissions and/or toxic air contaminants proximate to existing or planned sensitive receptors. [Threshold AQ-4]

Page 5.4-86, Section 5.4, *Biological Resources*, and Table 1-3 in Chapter 1, *Executive Summary*, is hereby modified as follows:

Impact 5.4-4: ~~Development of t~~ The Proposed Project ~~w~~could affect wildlife movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites ~~result in the loss of riparian habitat or sensitive natural communities identified in local or regional plans, policies, or regulations or by the CDFWor USFWS~~. [Threshold B-4]

Page 5.4-91, Section 5.4, *Biological Resources*, and Table 1-3 in Chapter 1, *Executive Summary*, is hereby modified as follows:

BIO–1 Biological resources shall be analyzed on a project-specific level by a qualified biological consultant. A general survey shall be conducted to characterize the project site, and focused surveys should be conducted as necessary to determine the presence/absence of special-status species (e.g., focused sensitive plant or wildlife surveys). For proposed discretionary projects within SEAs, biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of biological resources on-site (e.g., observed and detected species as well as an analysis of those species with potential to occur onsite).

Page 5.5-23, Section 5.5, *Cultural Resources*, and Table 1-3 in Chapter 1, *Executive Summary*, is hereby modified as follows:

CUL-2 Prior to the issuance of any grading permit associated with a discretionary project, applicants shall provide written evidence to the County of Los Angeles that a County-approved archaeologist has been retained to observe grading activities greater than three feet in depth and to salvage and curate archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference;~~,~~ shall establish procedures for archaeological resource surveillance and monitoring;~~, and~~ shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate; and shall obtain a commitment

from an American Association of Museums accredited repository for the storage of any recovered significant archaeological remains.

~~The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeologist resource surveillance and monitoring, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the fossils as appropriate and obtain a commitment from an American Association of Museums accredited repository for the storage of any recovered significant archaeological remains.~~

If the archaeological resources are found to be significant, the archaeologist shall determine appropriate actions, in cooperation with the project applicant and the County, for exploration and/or salvage. Any recovered significant archaeological resources shall be permanently transferred to an appropriate repository, subject to the fees and conditions of acceptance as established by the repository in their repository agreement. Prior to the release of the grading bond, the applicant shall submit a report prepared by the archaeologist that identifies the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.

Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis, if required by mitigation measures. These actions, as well as final mitigation and disposition of the resources shall be subject to the approval of the County.

CUL-3 Prior to the issuance of any grading permit associated with a discretionary project, applicants shall provide written evidence to the County of Los Angeles that a County-approved paleontologist has been retained to observe grading activities greater than three feet in depth and to salvage and curate paleontological resources as necessary. The paleontologist shall be present at the pre-grade conference;~~,~~ shall establish procedures for paleontologist resource surveillance and monitoring;~~, and~~ shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate; and shall obtain a commitment from an American Association of Museums accredited repository for the storage of any reocovered significant paleontological remains.

~~The paleontologist shall be present at the pre-grade conference, shall establish procedures for paleontologist resource surveillance and monitoring, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the fossils as appropriate and obtain a commitment from an American Association of Museums accredited repository for the storage of any recovered significant paleontological remains.~~

If the paleontological resources are found to be significant, the paleontologist shall determine appropriate actions, in cooperation with the project applicant and the County, for exploration and/or salvage. Any recovered significant paleontological resources shall be permanently transferred to an appropriate repository, subject to the fees and conditions of acceptance as established by the repository in their repository agreement. Prior to the release of the grading bond, the applicant shall obtain approval of the paleontologist's report, from the County. The report shall include the period of inspection, an analysis of any fossils found and the present repository of the fossils. Applicant shall prepare excavated material to the point of identification.

Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis, if required by mitigation measures. These actions, as well as final mitigation and disposition of the resources shall be subject to the approval of the County.

Page 5.6-3, Section 5.6, *Geology and Soils*, is hereby modified as follows:

[11]Los Angeles County Code, ~~Title 26, Appendix J Grading~~ The Grading Code Ordinance and Regulations, https://library.municode.com/index.aspx?clientId=16274, accessed on February 24, 2014.

Page 5.6-13, Section 5.6, *Geology and Soils*, is hereby modified as follows:

- The presence of shallow groundwater. Saturated sediments are necessary for seismically induced liquefaction to occur. In general, the highest liquefaction susceptibility is found in sedimentary soils of ~~late~~ Holocene ~~to late Pleistocene~~ age (i.e., ~~1,000 to 15,000~~ present to approximately 11,700 years before present [B.P.]) in areas where the groundwater is shallower than about 50 feet below ground surface (bgs).

Page 5.6-21, Section 5.6, *Geology and Soils*, is hereby modified as follows:

Individual development plans would be required to adhere to existing building and grading codes. These codes contain provisions for soil preparation/conditioning to minimize hazards from unstable and expansive soils. Grading and building activities also requires the preparation of site-specific grading/building plans, soils and geology reports to address liquefaction, subsidence, hydrocollapse, and other potential geologic or soil stability issues. Such plans and reports must be tendered to the County for review and approval before development within the Project Area can commence. Submittal of these technical plans and studies would ensure that hazards arising from unstable and expansive soils would be minimized to the extent practicable.

Page 5.7-24, Section 5.7, *Greenhouse Gas Emissions*, is hereby modified as follows:

- **Solid Waste Disposal**: ~~Indirect emissions from waste generation include~~ Reduce fugitive GHG emissions associated with landfill operations and activities.

Page 5.7-35, Section 5.7, *Greenhouse Gas Emissions*, and Table 1-3 in Chapter 1, *Executive Summary*, is hereby modified as follows:

GHG-1 The County of Los Angeles shall include the following implementation actions~~, consistent with the CCAP measures drafted in the Final Unincorporated Los Angeles County Community Climate Action Plan 2020,~~ in the Antelope Valley Area Plan Implementation Plan (Chapter 8) to ensure progress toward meeting the long-term GHG reduction goals of Executive Order S-03-05.~~:~~

The County shall further research to determine the feasibility, and as appropriate, propose amendments to the County Code for the following:

- Require new residential and ~~new~~ nonresidential buildings within the Antelope Valley Area Plan to achieve the Tier 1 energy standards within California Green Building Standards Code (Title 24, Part 11). The voluntary Tier 1 CALGreen requires a 15 percent increase in energy efficiency compared to the Building and Energy Efficiency Standards (Title 24, Part 6). Architectural building plans shall be submitted to the County that identify features that achieve the Tier 1 energy standards (corresponding CCAP Measure BE-1).
- Require that new residential and non-residential building be constructed to accommodate roof-top solar installation. Architectural building plans shall be submitted to the County shall identify this requirement (corresponding CCAP Measure BE-3).
- Prior to issuance of building permits for new construction of non-residential development of 100,000 building square feet or more within the Antelope Valley Area Plan, the applicant shall identify bicycle end-trip facilities, including bike parking and lockers. The location of the bicycle storage shall be specified on site plans and verified by Department of Regional Planning prior to building permit issuance (corresponding CCAP Measure LUT-1).
- Require installation of Level 2 (240 volt) electric vehicle (EV) charging facilities at County-owned public venues (e.g., hospitals, beaches, stand-alone parking facilities, cultural institutions, and other facilities) within the Antelope Valley Area Plan and ensure that at least one-third of these charging stations will be available for visitor use (corresponding CCAP Measure LUT-8).

GHG-2 The County of Los Angeles shall include the following additional implementation actions in the Antelope Valley Area Plan Implementation Plan (Chapter 8) to ensure progress toward meeting the long-term GHG reduction goals of Executive Order S-03-05:

The County shall further research to determine the feasibility, and as appropriate, propose amendments to the County Code for the following:

- Prior to issuance of building permits for new construction of residential development, the property owner/developer shall indicate on plans that garage and/or car port parking are electrically wired to accommodate a Level 2 (240 volt) EV charging. The location of the electrical outlets shall be specified on building plans, and proper installation shall be verified by Department of Public Works prior to issuance of a Certificate of Occupancy.
- Prior to issuance of building permits for new construction of non-residential development of 100,000 building square feet or more within the Antelope Valley Area Plan, the applicant shall indicate on plans that at minimum, 10 Level 2 EV vehicle charging stations will be provided for public use. The location of the EV station(s) shall be specified on building plans, and proper installation shall be verified by the Department of Public Works prior to issuance of a Certificate of Occupancy.
- The County of Los Angeles shall require applicants of new residential developments to consider installation of gray water systems for resident use.
- The County of Los Angeles shall require applicants of non-residential developments of 100,000 building square feet or more, to coordinate with the Antelope Valley Transit Authority to negotiate the installation of additional bus shelters and transit stops.

Page 5.7-37, Chapter 5.7, *Greenhouse Gas Emissions*, is hereby modified as follows:

~~Los Angeles,~~ County of Los Angeles. 2014, June. Final Unincorporated Los Angeles County Community Climate Action Plan 2020.

Page 5.9-2, Section 5.9, *Hydrology and Water Quality*, is hereby modified as follows:

The Project Area lies within the jurisdiction of Los Angeles RWQCB (Region 4) and the Lahontan RWQCB (Region 6V) and is subject to the waste discharge requirements of the Los Angeles County MS4 Permit (Order No. R4-2012-0175) and NPDES Permit No. CAS004001, as amended by Order No. R8-2010-0062. Los Angeles County, the Los Angeles County Flood Control District, and 84 incorporated cities within the coastal watersheds of Los Angeles County are co-permittees under the MS4 Permit, with the exception of the City of Long Beach, which is covered under a separate MS4 permit. Pursuant to the MS4 Permit, the co-permittees have the flexibility to develop Watershed Management Programs, which implement the requirements of the Permit on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Watershed Management Programs (WMP) have been developed for the Upper Santa Clara River Watershed, the Upper Los Angeles River Watershed, and the Upper San Gabriel River Watershed, all of which encompass part of the Project Area. No management program has been adopted for the Antelope Valley Watershed. The MS4 Permit also requires the municipalities to have~~develop and implement~~ low impact development (LID) ordinances and green streets policies in place per the MS4 permit provisions for ~~at least 50 percent of the area covered by~~ the WMP.

Page 5.9-19, Section 5.9, *Hydrology and Water Quality*, is here by modified as follows:

An emerging contaminant of concern is hexavalent chromium or chromium-6. Chromium-6 can occur naturally in the environment from the erosion of natural chromium deposits, but can also be produced by industrial processes where it is used for chrome plating, dyes and pigments, and leather and wood preservation. This element is a known carcinogen and California has recently implemented a ~~new lower~~ MCL of 10 micrograms per liter. Twelve wells belonging to various water purveyors within the southern portion of the Antelope Valley have tested in excess of this MCL within the last 10 years; these wells are subject to continued monitoring (AVEKWA 2012).

Page 5.9-27, Section 5.9, *Hydrology and Water Quality*, is hereby modified as follows:

Groundwater continues to be an important resource for water supply in the Project Area. Prior to 1972, groundwater provided more than 90 percent of the total water supply. Since 1972, it provides 50 percent to 90 percent of the total water supplied to the Project Area. In terms of groundwater recharge, only about 5 percent of the precipitation that falls in the Antelope Valley each year percolates to the groundwater basin, while the remaining water is lost to evaporation~~precipitation~~. There is an overdraft of groundwater in this region in the past, resulting in subsidence and earth fissures in the Lancaster and Edwards Air Force Base areas.

The 2013 Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) forecasts that groundwater resources combined with existing and new imported SWP water, surface water, and recycled water supplies will be sufficient to meet the population needs of the Antelope Valley~~, including the Project Area,~~ through the year 2035, assuming a population increase to 547,000 by 2035. Most of the implementation projects to address water supply issues in the AVIRWMP come directly from local planning documents. Altogether, the projects included in the AVIRWMP directly implement elements of a number of local plans and studies, including Urban Water Management Plans (UWMPs), Water Recycling Master Plans, Water Conservation Master Plans, and Master Facilities Plans.

Page 5.10-26, Section 5.10, *Land Use and Planning*, is hereby modified as follows:

Once approved, the Draft Desert Renewable Energy Conservation Plan NCCP/HCP would provide renewable energy project developers with binding, long-term endangered species permit assurances while facilitating the review and approval of solar thermal, utility-scale solar photovoltaic, wind, and other forms of renewable energy and associated infrastructure. Because the Draft Desert Renewable Energy Conservation Plan NCCP/HCP is not yet approved, implementation of the Proposed Project would not conflict with the Plan. Furthermore, the Proposed Area Plan establishes that site-specific renewable energy systems are highly preferred over new utility-scaled energy projects (see Policy COS 12.1). Lastly, approval of the Proposed Project does not include approval of specific energy projects in the plan area of the Draft Desert Renewable Energy Conservation Plan NCCP/HCP.

3. Revisions to the Draft EIR

Page 5.14-1, Section 5.14, *Public Services*, is hereby modified as follows:

Currently there are three~~two~~ battalions with 21 fire stations located throughout the Project Area as shown on Table 5.14-1.

Table 5.14-1 Fire Stations Serving the Project Area

BATTALION11		BATTALION17	
Fire Station #33-HDQTRS	44947 Date Ave Lancaster, 93534	Fire Station #24-HDQTRS	1050 W Avenue P Palmdale, 93550
Fire Station #78 (Augmented CFF)	17021N Elizabeth Lake Rd Palmdale, 93550	Fire Station #37	38318 E 9th St East Palmdale, 93550
Fire Station#84	5030 W Avenue L-14 Quartz Hill, 93536	Fire Station #79	33957 Longview Rd Pearblossom,93553
Fire Station #112 (CFF)	8812 W Avenue E-8 Lancaster, 93535	Fire Station #80	1533 W Sierra Hwy Acton, 93510
Fire Station #117	44851 3oth St East Lancaster, 93535	~~Fire Station #81~~	~~8710 W Sierra Hwy~~ ~~Agua Dulce, 91350~~
Fire Station #129	42110 6th St West Lancaster, 93534	Fire Station #92	8905 E Avenue U Littlerock, 93535
Fire Station #130	44558 40th St West Lancaster, 93536	Fire Station #93	5624 E Avenue R Palmdale, 93550
Fire Station #134	43225 N 25th St W Lancaster, 93534	Fire Station #114	39939N 170th St East Palmdale, 93550
Fire Station #135	1846 East Avenue K-4 Lancaster, 93535	Fire Station #131	2629 E Avenue S Palmdale, 93550
Fire Station #140 (CFF)	8723 Elizabeth Lake Rd Leona Valley,93550	Fire Station #136	3650 Bolz Ranch Rd Palmdale, 93551
Fire Station #157 (CFF)	15921 Spunky Canyon Rd Green Valley, 91350		
BATTALION 6			
Fire Station #77	46833 Peace Valley Rd Gorman, 93243		

Page 5.17-9, Chapter 17, *Utilities and Service Systems*, is hereby modified as follows:

[2] The wastewater generation factor, 76 gpcd, is from the Los Angeles County Climate Action Plan (~~LACDPW 2014a~~County of Los Angeles 2014).

Page 5.17-13, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

California Governor Edmund Brown Jr. declared a drought state of emergency on January 17, 2014, asking Californians to voluntarily reduce water use by 20 percent. 2013 was the driest year in recorded history in many parts of California. The extreme drought is continuing in 2014: statewide, between October 1, 2013

and June 30, 2014, precipitation was 50 percent of average, runoff was 35 percent of average, and reservoir storage 60 percent of average (~~DRW~~ DWR 2014). Initially, the DWR announced on January 31, 2014, that if current dry conditions persist, customers would receive no deliveries from the State Water Project (SWP) in 2014, except for small carryover amounts from 2013. Later, DWR increased the SWP allocation to 5 percent and deliveries would start in August 2014. Almost all areas served by the SWP also have other sources of water, such as groundwater and local reservoirs (DWR 2014). Additionally, deliveries from the Central Valley Project in 2014 were cut to zero for agriculture users south of the Sacramento-San Joaquin Delta.

Figure 5.17-2, Page 5.17-15, Chapter 17, *Utilities and Service Systems*, is hereby modified as follows:

Source: ~~LACDPW 2013, AVEK 2013; CLWA 2014~~ Leadership Committee of Greater Los Angeles County Integrated Regional Water Management Region, *Greater Los Angeles County Integrated Regional Water Management Plan 2013 Update*, February 2014.

Page 5.17-17, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

Water supply for the Antelope Valley Region comes from three primary sources: SWP, surface water stored in the Littlerock Reservoir, and the Antelope Valley Groundwater Basin. The Antelope Valley Region's SWP contractual Table A Amount is approximately 170,000 ~~165,000~~ acre-feet per year (AFY).[4] With proper treatment, SWP water is generally high quality water well-suited for municipal and industrial (M&I) uses; however, the reliability of the SWP water supply is variable and has decreaased in recent years due to drought emergency. Surface water stored at the Littlerock Reservoir, which has a storage capacity of ~~3,325~~ 3,500 AF, is used directly for agricultural uses and for M&I purposes following treatment (PWD 2014).

Page 5.17-21, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

~~Projected water supplies by source~~ Population projections in the Antelope Valley IRWM Region are shown below in Table 5.17-2. The Antelope Valley IRWMP 2013 Update forecasts that the population within the IRWM Region will increase to 547,000 in 2035 from a 2010 US Census count of about 390,000, which is a net increase of about 157,000 ~~201,000~~ (AVRWMG 2013).

Table 5.17-4, Page 5.17-22, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

Source: ~~LACDPW 2014b~~ Leadership Committee 2013

Page 5.17-23, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

Existing and projected average water year demands for IRWM Regions serving the Project Area are shown below in Table 5.17-6.

Table 5.17-6 Existing and Projected Average Water Year Demands by IRWM Region/Subregion in Acre-Feet ~~per Year~~

IRWM Region/Subregion	2015	2020	2025	2030	2035
Antelope Valley[1,4]	187,000	195,000	200,000	205,000	210,000
Upper Santa Clara River[2]	94,553	94,218	102,647	109,674	118,203
Upper Los Angeles River[3]	439,111	462,331	477,376	493,481	500,228
Upper San Gabriel and Rio Hondo[3]	325,122	341,951	349,647	357,392	363,856
Total	1,045,786	1,093,500	1,129,670	1,165,547	1,192,287

[1] Sources: AVRWMG 2013~~, CLWA 2014, LACDPW 2014b~~
[2] Source: CLWA 2014
[3] Source: Leadership Committee 2013
[4] Note that these numbers do not take into consideration dry year demands.

Water Treatment Facilities

Water treatment facilities filter and~~/or~~ disinfect water before it is delivered to customers.

Page 5.17-24, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

PWD's water treatment plant has the capacity to treat ~~is~~ 35 MGD~~ (39,235 AFY), but it is limited to treating 28 MGD (31,390 AFY)~~. (PWD 2014) PWD is also in the preliminary design stage for a new water treatment plant with an initial capacity of 10 MGD.

Page 5.17-26, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

Supply Reliability. MWD evaluated supply reliability by projecting supply and demand conditions for the single- and multiyear drought cases based on conditions affecting the SWP (MWD's largest and most variable supply). For this supply source, the single driest year was 1977 and the driest three-year period was 1990 to 1992. According to the most recent update of MWD's Integrated Water Resources Plan, ~~T~~the region can provide reliable water supplies not only under normal conditions but also under the single driest year and the multiple dry year conditions. (MWD 2010)

Page 5.17-27, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

Antelope Valley Groundwater ~~Basin Adjudication~~ Cases

In approximately 1999, agricultural interests in the Antelope Valley initiated litigation in state court seeking to determine certain rights to groundwater. In approximately 2005, certain public water supplies, including LACWD 40, filed a cross-action seeking an adjudication of groundwater rights within the basin. Other agencies and parties have filed separate actions concerning groundwater rights in the Antelope Valley Area of Adjudication (AVAA). The Court has coordinated and consolidated the actions in one action in Los Angeles Superior Court. Four phases of the trial have been completed in the adjudication during which the court has defined the adjudication area boundary (i.e., the AVAA) and determined that the total safe yield of the AVAA is 110,000 AFY, that the AVAA has been in a state of overdraft for over 50 years, and the current pumping by

the parties exceeds the safe yield of the AVAA. The action will result in a judgment (by trial and/or stipulation) containing a final allocation of groundwater rights and a long-term groundwater management system for the AVAA. It is unknown how long it will take to complete the adjudication litigation.

Reliability

~~According to~~ As stated in the AVRWMG 2013 Update, "Since long-term recharge is expected to be stable, it is anticipated that groundwater pumping, and hence supply, will be reliable even in short-term and multiple year droughts" ~~(AVRWMG 2013 Update)~~. Thus groundwater is considered a reliable supply for the Antelope Valley Region. However, the pending adjudication will affect how much groundwater can physically be pumped in the Antelope Valley Region in the future to insure that AVAA groundwater is not overdrafted. It is important to note that the supplemental yield from imported water return flows depends upon demand and may fluctuate with changes in demand. The imported water return flow estimates are meant to indicate a sense of the impact of return flows to the AVAA groundwater basin.

Page 5.17-29, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

Water Demands

Although four IRWM Regions serve the Project Area, only the Antelope Valley IRWM contains land use designations that would allow future development. As a result, the following impact analysis focuses on the ability of the Antelope Valley IRWM to serve the Proposed Project at buildout. Based on a current per capita water consumption factor of 0.223 acre feet per year for the Antelope Valley IRWM[3], the projected net increase in water demands due to Proposed Project buildout is approximately ~~42 million gallons per day~~ 69,500 acre feet per year, excluding agricultural demand. ~~, as shown below in Table 5.17-7.~~ It should be noted that future water consumption in the Project Area may be less due to increased use of reclaimed water, and increased water efficiency and conservation required by the recently adopted California Green Building Standards Code.

~~Table 5.17-7Estimated Water Demand due to Proposed Project Buildout~~

	~~Existing (2013)~~		~~Area Plan Buildout~~		
	~~Population~~	~~Water Demands (estimated as 166 gallons per capita per day)[1]~~	~~Population~~	~~Water Demands (estimated as 142 gallons per person per day)[1]~~	~~Net Increase, Water Demands~~
~~Antelope Valley~~	~~93,490~~	~~15,519,340~~	~~405,410~~	~~57,568,220~~	~~42,048,880~~

~~Estimated water demands include demands by all land uses, residential and nonresidential; and including potable water and nonpotable water.~~
~~[1] Source for GPD ratio: LACDPW 2014a~~

[3] Antelope Valley Regional Water Management Group (AVRWMG). 2013. *Antelope Valley Integrated Regional Water Management Plan 2013 Update,* Table 3-4. http://www.avwaterplan.org/.

3. Revisions to the Draft EIR

Page 5.17-30, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

Antelope Valley IRWM Region

~~Total water supplies in~~ The average water year demand for the Antelope Valley IRWM Region in 2035 ~~are forecast~~ is projected to be approximately ~~210,600~~ 216,000 afy~~, which, is adequate~~ for the projected 2035 population of 547,000 people for the whole Antelope Valley IRWM Region including the incorporated cities of Palmdale and Lancaster, unincorporated areas, and part of Kern County. (AVRWMG 2013) However, under single dry year or multiple dry year periods, projected demands (216,000 afy) would exceed project supplies (154,800 afy and 174,800 afy, respectively). No demand projections ~~estimate of supply~~ beyond 2035 is available for the Antelope Valley IRWM Region. Therefore, even with planned future water supplies under consideration by Antelope Valley water agencies, water supplies in the Project Area would not be adequate to serve the buildout of the Proposed Project which is anticipated to be beyond 2035. New and/or expanded water supplies would be required to meet such demands. This impact would be significant.

Page 5.17-30, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

~~In terms of supply, t~~The implementation and conceptual projects proposed will ~~allow~~ provide additional supply to the Region to supplement the future demand ~~maintain adequate supply and demand in average years~~. The IRWM projects identify approximately 30,000 AFY of new supply, while also identifying up to approximately 600,000 AFY of water bank storage capacity. These projects, if implemented, would help the Region to lessen the gap between supply and demand for ~~meet demands during~~ single~~-~~ dry ~~years~~ and multiple ~~-~~dry year periods~~, as well as during a plausible six month disruption of SWP deliveries.~~ (AVRWMG 2013)

Page 5.17-31, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

As discussed above, no demand projections ~~estimate of supply~~ beyond 2035 is available for the Antelope Valley IRWM Region. Therefore, even with planned future water supplies under consideration by the Antelope Valley water agencies, water supplies in the Project Area would not be adequate to serve the buildout of the Proposed Project. New and/or expanded water supplies would be required to meet such demands. This impact would be cumulatively significant.

Page 5.17-33, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

~~Adequate water supplies have been identified in the UWMP's for the Project Area for demand as projected through the year 2035. However, additional~~ The AVIRWMP 2013 Update identifies the need for future conservation, recycled water, stormwater capture, water banking, and additional water supply projects to meet future demand through the 2035 planning period. Demand for water exceeds available supplies. In future single dry years, the supply demand mismatch is estimated to be 61,200 AFY. W~~w~~ater supplies necessary to serve buildout of the Project Area under the Proposed Project, which is expected to occur beyond the year

2035, have not been identified for the Project Area. Considering current water supply constraints—including the record 2013–2014 California drought~~—it is uncertain whether the water districts serving the Project Area would be able to secure water supplies greater than those currently forecasted for 2035.~~ there is not sufficient water secured for the buildout of the Project Area under the Proposed Project. New water supplies will need to be secured, and t~~T~~herefore, impacts of the Proposed Project buildout on water supplies are significant~~ and unavoidable~~.

Page 5.17-34, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

AB 341 (Chapter 476, Statutes of 2011) established a State policy goal of not less than 75 percent of solid waste generated b~~y~~e source reduced, recycled, or composted by the year 2020. The law also mandates recycling for commercial and multifamily residential land uses as well as schools and school districts.

Los Angeles County Countywide Siting Element

In 1997, the County prepared the Los Angeles County Countywide Siting Element (Siting Element) which projects the amount of solid wastes generated in the future, as well as analyzes the extents to which factors such as recycling, developing alternative-to-landfill facilities, landfill expansions, and exporting trash could impact Countywide disposal capacity. The Siting Element~~s~~ is a long-term planning document that describes how the County and the cities within the County plan to manage the disposal of their solid waste for a 15-year planning period. The Siting Element identifies DPW as the responsible agency to develop plans and strategies to manage and coordinate the solid waste generated in the unincorporated areas and to address the disposal needs of the County. In addition, the Siting Element contains goals and policies on a variety ofsolid waste management issues. The County will continue to meet its disposal capacity needs by implementing enhanced waste reduction and diversion programs and greater resource recovery efforts.

Table 5.17-11, Page 5.17-48, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

[1] Source: ~~LACDPW 2014a~~ County of Los Angeles 2014

Table 5.17-12, Page 5.17-48, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

[1] Source: ~~LACDPW 2014a~~ County of Los Angeles 2014.

Page 5.17-51, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

County of Los Angeles. 2014, June. Final Unincorporated Los Angeles County Community Climate Action Plan 2020.

Page 5.17-52, Section 5.17, *Utilities and Service Systems*, is hereby modified as follows:

Leadership Committee of the Greater Los Angeles County Integrated Regional Water Management Region (Leadership Committee). February 2014. Greater Los Angeles County Integrated Regional Water Management Plan 2013 Update. http://www.ladpw.org/wmd/irwmp/index.cfm?fuseaction=TopDocListing&directory=RMC12-10Submittal-FinalPlan&ttl=2014%20Public%20Draft%20IRWMP%20Update.

~~Los Angeles County Department of Public Works (LADPW). 2014a, June. Final Unincorporated Los Angeles County Community Climate Action Plan.~~

~~Los Angeles County Department of Public Works (LADPW). 2014b, February. Greater Los Angeles County Integrated Regional Water Management Plan. http://www.ladpw.org/wmd/irwmp/index.cfm?fuseaction=TopDocListing&directory=RMC12-10Submittal-FinalPlan&ttl=2014%20Public%20Draft%20IRWMP%20Update.~~

Palmdale Water District. 2014. Water Supply. http://www.palmdalewater.org/about/water-supply/.

Page 6-5, Section 6, *Significant Unavoidable Adverse Impacts*, is hereby modified as follows:

- **Impact 5.17-3:** ~~Adequate water supplies have been identified in the UWMP's for the Project Area for demand as projected through the year 2035. However, additional water supplies necessary to serve buildout of the Proposed Project, which is expected to occur beyond the year 2035, have not been identified for the Project Area. Considering current water supply constraints—including the record 2013–2014 California drought—it is uncertain whether the water districts serving the Project Area would be able to secure water supplies greater than those currently forecasted for 2035. Therefore, impacts of the Proposed Project buildout on water supplies are significant and unavoidable.~~The AVIRWMP 2013 Update identifies the need for future conservation, recycled water, stormwater capture, water banking, and additional water supply projects to meet future demand through the 2035 planning period. Demand for water exceeds available supplies. In future single dry years, the supply demand mismatch is estimated to be 61,200 AFY. Water supplies necessary to serve buildout of the Project Area under the Proposed Project, which is expected to occur beyond the year 2035, have not been identified for the Project Area. Considering current water supply constraints – including the record 2013-2014 California drought – there is not sufficient water secured for the buildout of the Project Area under the Proposed Project. New water supplies will need to be secured, and therefore, impacts of the Proposed Project buildout on water supplies are significant.

Page 7-7, Section 7.0, Alternatives to the Proposed Project, is hereby modified as follows:

3.4 NO PROJECT/~~EXISTING~~ ADOPTED AREA PLAN ALTERNATIVE

Page 13-7, Chapter 13, *Bibliography*, is hereby modified as follows:

County of Los Angeles. 2014, June. Final Unincorporated Los Angeles County Community Climate Action Plan 2020.

Page 13-9, Chapter 13, *Bibliography*, is hereby modified as follows:

Los Angeles, County of. ~~2014, June. Final Unincorporated Los Angeles County Community Climate Action Plan 2020.~~

~~———.~~ 2014. Airport Land Use Commission (ALUC) Airport Information. http://planning.lacounty.gov/aluc/airports

Page 13-10, Chapter 13, *Bibliography*, is hereby modified as follows:

Leadership Committee of the Greater Los Angeles County Integrated Regional Water Management Region (Leadership Committee). February 2014. Greater Los Angeles County Integrated Regional Water Management Plan 2013 Update. http://www.ladpw.org/wmd/irwmp/index.cfm?fuseaction=TopDocListing&directory=RMC12-10Submittal-FinalPlan&ttl=2014%20Public%20Draft%20IRWMP%20Update.

Los Angeles County Department of Public Works (LADPW). ~~2014, March 25. Malibu Mesa Wastewater Reclamation Plant. http://dpw.lacounty.gov/SMD/wtp/Page_01.cfm.2014, February. Greater Los Angeles County Integrated Regional Water Management Plan. http://www.ladpw.org/wmd/irwmp/index.cfm?fuseaction=TopDocListing&directory=RMC12-10Submittal-FinalPlan&ttl=2014%20Public%20Draft%20IRWMP%20Update.~~

~~———. 2014, March 25. Malibu Water Pollution Control Plant. http://dpw.lacounty.gov/SMD/wtp/Page_02.cfm.~~

~~———. 2014, March 25. Trancas Water Pollution Control Plant.~~ http://dpw.lacounty.gov/SMD/wtp/Page_03.cfm~~.~~

~~———.~~ 2014, February. Low Impact Development Standards Manual.

Metropolitan Water District of Southern California (MWD). 2010 (October). Integrated Water Resources Plan 2010 Update.

Palmdale Water District. 2014. Water Supply. http://www.palmdalewater.org/about/water-supply/.

3. Revisions to the Draft EIR

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Appendix A Final Buildout Methodology

Appendices

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2014

Buildout Methodology

FINAL DRAFT

This document describes the steps taken to generate the Buildout for the Department of Regional Planning's 2014 Antelope Valley Plan

Dan Hoffman / Colin Drukker
Department of Regional Planning / Placeworks
10/2/2014

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Appendix A - Assumptions / Factors for Current Conditions

Appendix B - Assumptions / Factors for Proposed Conditions

Appendix C – Natelson Company Employment Density Study 2001 - excerpt

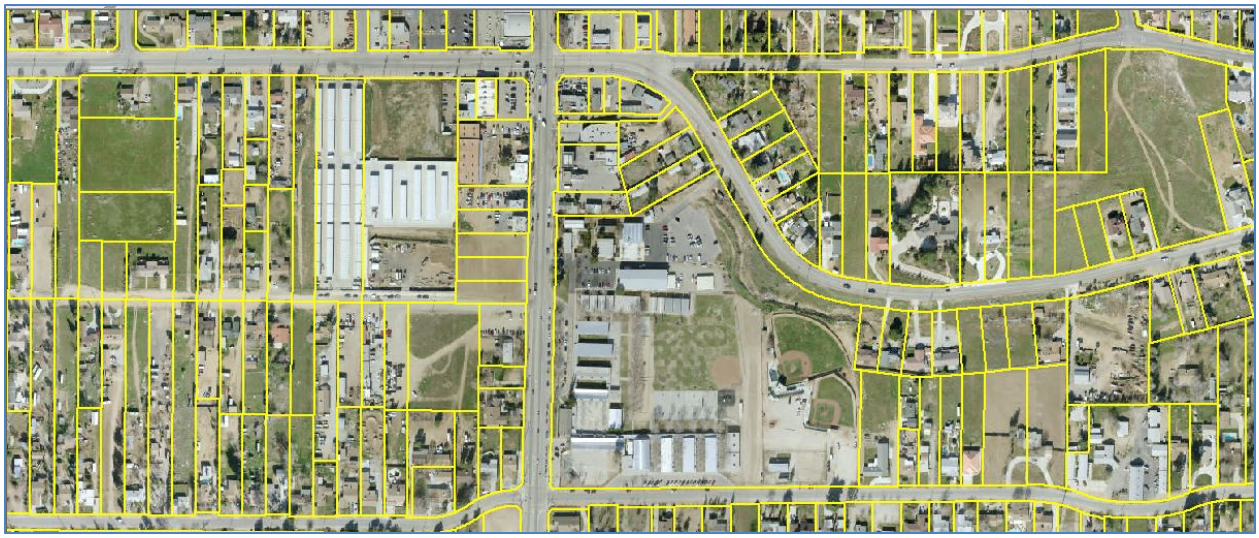
Overview of Buildout Models

The buildout for the Los Angeles County Antelope Valley Areawide General Plan Update ("Proposed AV Plan") was established by Placeworks (formerly The Planning Center) and put into a GIS format by the Department of Regional Planning. Three basic datasets were derived that show existing conditions, current conditions (adopted AV Plan), and proposed conditions (Proposed AV Plan). The following is a generalized description of the buildout and the basic steps and formulas used to arrive at the final projected numbers.

1. Existing Conditions

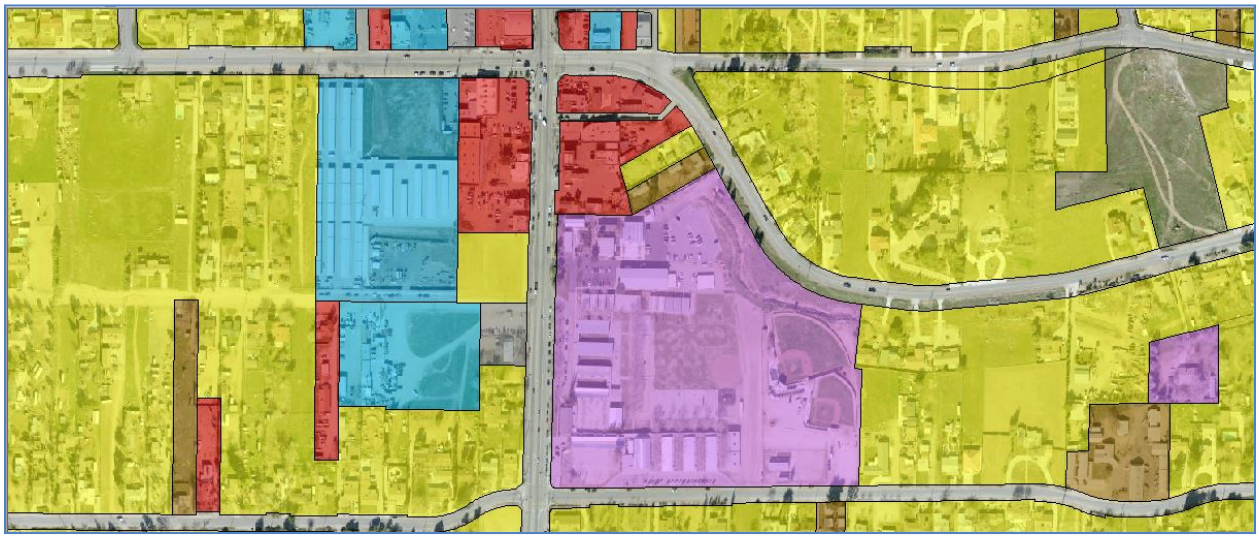
Existing Conditions are based on data from the Los Angeles County Assessor for the unincorporated areas only. The parcels were taken from the April, 2011 version of the Assessor Database. Figure 1.A shows a sample of parcels in the Quartz Hill Community.

Figure 1.A



Within the Assessor Parcel data is a 'Use Code' with categories that were established by the Assessor. The parcels were aggregated by Assessor Use Code and in Figure 1.B below, the different colors represent the different Residential, Commercial, and Industrial categories (among others) in this area. Red is commercial, yellow is single-family residential, brown is multi-family residential, pink is public facilities, and blue is industrial.

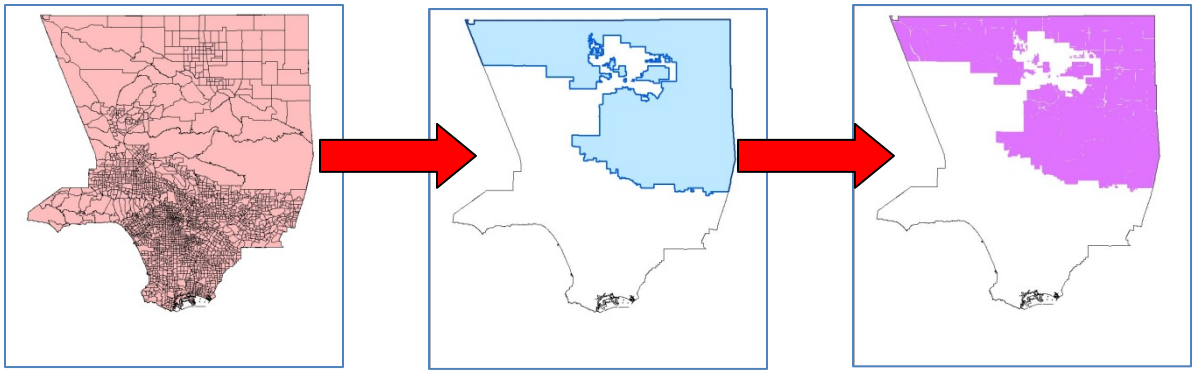
Figure 1.B



This aggregated parcel layer was then combined with the 2008 Traffic Analysis Zones (TAZ) from the Southern California Association of Governments (SCAG) and the Plan Areas used by the Department of Regional Planning (DRP).

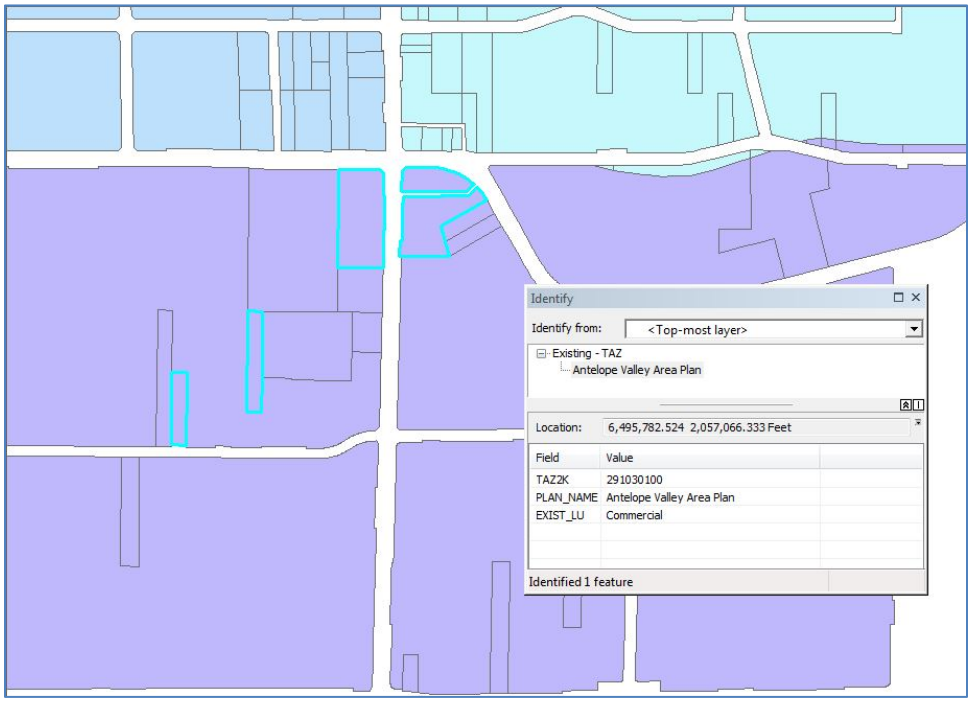
Figure 1.C

TAZ *DRP Plan Areas* *Aggregated Parcel layer*



The result of this combination is that each of the Aggregated land use categories have a SCAG TAZ ID and a DRP Planning Area coded into it. In Figure 1.D below the Assessor Land Use layer is colored based on the TAZ IDs. The blue outline is a selected aggregated polygon along with a pop-up window of the fields in the GIS data.

Figure 1.D



With this GIS layer now prepared, factors were established for each of the Assessor Land Use Categories in order to begin the calculations for the buildout.

Factors

Existing use, building square footage, and number of dwelling units were provided by the Assessor parcel data. Population estimates were made by applying single-family and multifamily development person per household assumptions (established by the County) to the number of units in each parcel. Employment estimates were made by applying employee per square foot assumptions to nonresidential square footage recorded by the Assessor. The employee assumptions are from the Natelson Company Employment Density Study (see Appendix C), with the exception of public/quasi-public uses, schools, and farms. Employment for public/quasi-public uses were calculated individually due to the range of uses within this category. Schools are estimated to employ 90 persons on average; based on a survey of LAUSD employment. This may vary by school type. Square feet per employee for farmworkers was determined by dividing the number of Los Angeles County farmworkers, as reported in the 2006 American Community Survey, by the building square footage for existing farms. See Figure 1.E below.

Figure 1.E

Assessor Land Use	Persons per Household	Square Foot / Emp	Notes
Commercial		511	
Commercial Reg		2,437	
Farm		90	
Industrial		1,306	
Miscellaneous Government		1,306	
Multifamily	2.79		
Office		302	
Parking		0	
Public/Quasi-Public			Calculated individually.
ROW			
School			Calculated individually.
Single-Family	3.85		
Utilities		1,306	
Vacant			
Warehouse		1,306	
Water		1,306	Employment generation factor provided in the event that a utility structure is included, but none are in the water category (according to this data set)

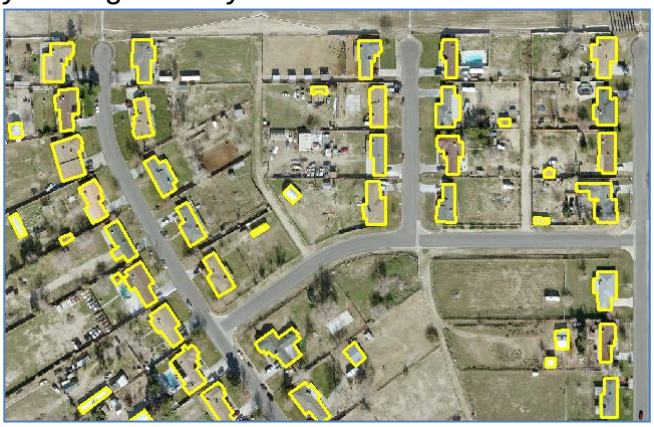
Once the factors are calculated for the various land uses, the following formulas can be applied to arrive at the final numbers:

1. Units - Single-Family and Multi-Family Units were taken directly from Assessor data. When the previously described data aggregation occurred the total units were summarized per land use category per TAZ.

2. Population - Units were multiplied by the Persons per Household factor shown in Figure 1.E above, based on multi-family or single-family:

   Formula:

   (Units) x (pph) = Population



3. Employment[1] - Employment is calculated in one of two ways:

   a) Employment was generated by determining the Building Square Footage for each employment-

[1] For more about Employment, please see section 5 on page 18.

generating use. Using a 'Building Outline' layer that was derived from 2008 aerial imagery (see aerial shot on bottom of Page 5), the total building square footage was calculated...taking also into account the total number of floors. For those parcels that did not have a building polygon, building square footage from the Assessor was used.[2]

Formula:

(Building Square Footage) / (Square Foot per Emp) = Employment

b) Some areas have specific employment factors. A field was added in the GIS layer to indicate whether a factor was applied to a general use, or whether a specific number of employees was determined by either contacting the factility, or getting the information through a Census site, or other online resource. The table below (Figure 1.F) breaks down these uses:

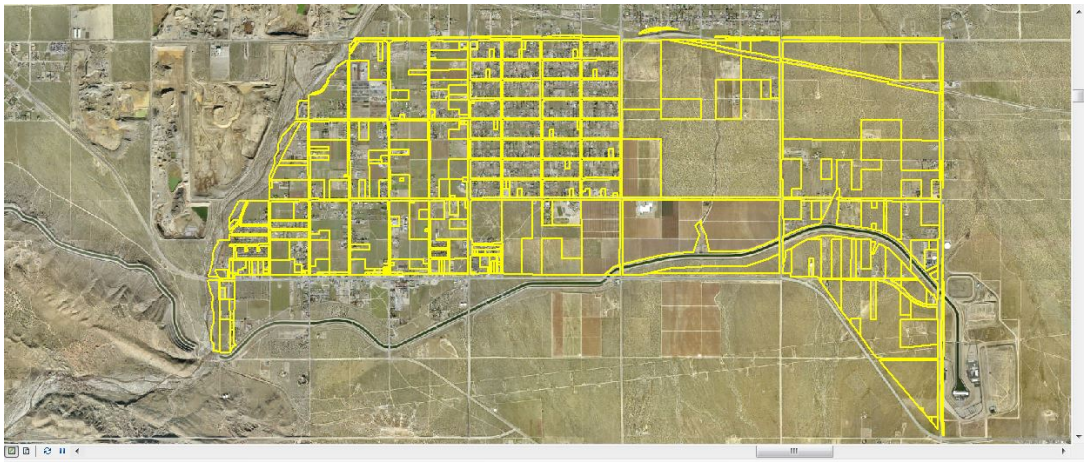
Figure 1.F

Land Use Type	Factor / Specific number	EMP
Airport	Specific Number	Found # of employees for each site
Amusement Parks	Specific Number	Found # of employees for each site
Cemeteries	Factor	100
City Hall	Specific Number	Found # of employees for each site
Colleges & Universities	Specific Number	Found # of employees for each site
Golf Courses	Factor	50
Hospitals & Medical Centers	Specific Number	Found # of employees for each site
Military Facilities	Specific Number	Found # of employees for each site
Preschools	Factor	90
Private and Charter Schools	Factor	100
Public Elementary Schools	Factor	100
Public High Schools	Factor	250
Public Middle Schools	Factor	100
Regional Parks & Gardens	Factor (small park)	25
Regional Parks & Gardens	Factor (large park)	50

After all of the Units, Population and Employment is determined, then all of the TAZs have a summary of Planning Area, Land Use, total units, population and employment. In Figure 1.G below, the GIS layer represents a sample TAZ and all of the data displayed in the table below it.

[2] Using this 'Building Outline' GIS layer was favorable as it represented a more accurate depiction of building square footage than what the Assessor had.

Figure 1.G



Table

BUILDOUT_EXISTING_USE

TAZ2K	EXIST_LU	UNITS_SF	UNITS_MF	UNITS_TTL	PPH	POP_SF	POP_MF	POP_TTL	SQFT_EMP	EMP	SOURCE	ACRES
291000001	Miscellaneous - Other	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	1306	4.576119	Used Assessor data and Factors from Planning Center	111.310346
291000001	Miscellaneous Government	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	1306	23.050338	Used Assessor data and Factors from Planning Center	169.517246
291000001	Multifamily	0	105.773785	105.773785	2.79	0	295.10886	295.108861	<Null>	<Null>	Used Assessor data and Factors from Planning Center	63.884997
291000001	Office	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	302	123.93176	Used Assessor data and Factors from Planning Center	6.072765
291000001	Parking	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	3.189312
291000001	Public Middle Schools	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	100	Based on factor from Planning Center	19.094893
291000001	Regional Parks & Gardens	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	25	Based on factor from Planning Center	5.830693
291000001	Single-Family	1101.23813	0	1101.238133	3.85	4239.766813	0	4239.766813	<Null>	<Null>	Used Assessor data and Factors from Planning Center	1731.186956
291000001	Vacant	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	<Null>	1148.86611

2. Current Conditions (Adopted Antelope Valley Plan)

For current conditions, the Land Use Policy from the 1986 Antelope Valley Plan was used.

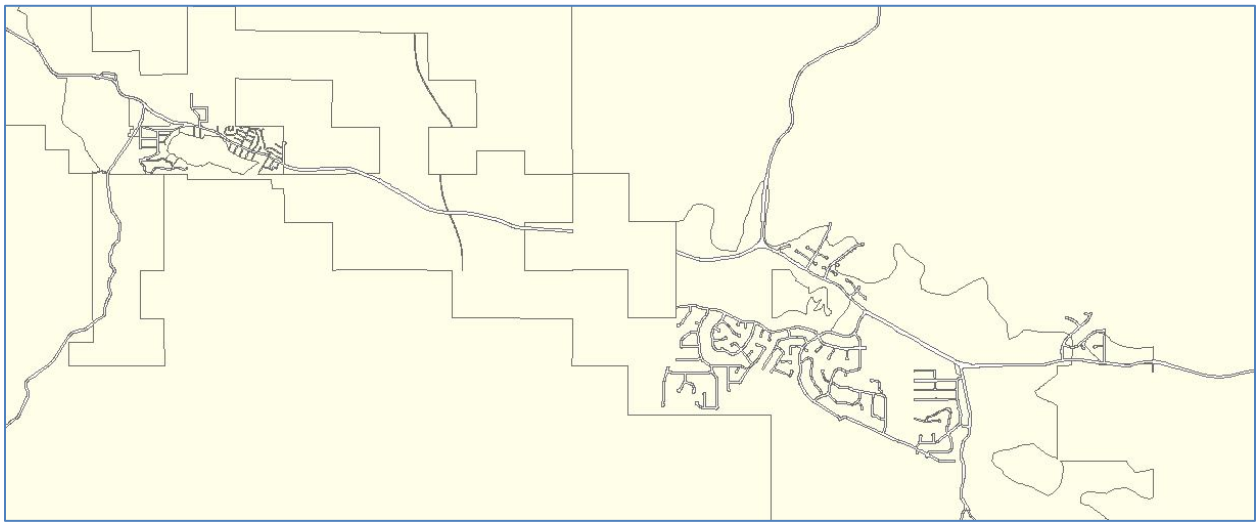
GIS Analysis

Similar to how the Assessor Land Use was generated, the Adopted Land Use Policy was incorporated into the parcel layer. The parcels were then aggregated based on Land Use category, and then combined with the 2008 TAZ layer from SCAG and the DRP Plan Areas using the same procedure outlined above in the Existing Conditions section (illustrated by Figures 1-A through 1-C). One additional layer was added for Hillside Management, which shows slope areas 25-50% and greater than 50%. The target densities are reduced depending on their range of slope. Additionally, any open space or National Forest areas were not considered for the Hillside Management reduction[3]. See Figure 2.A below for an example in the Lake Hughes / Lake Elizabeth communities.

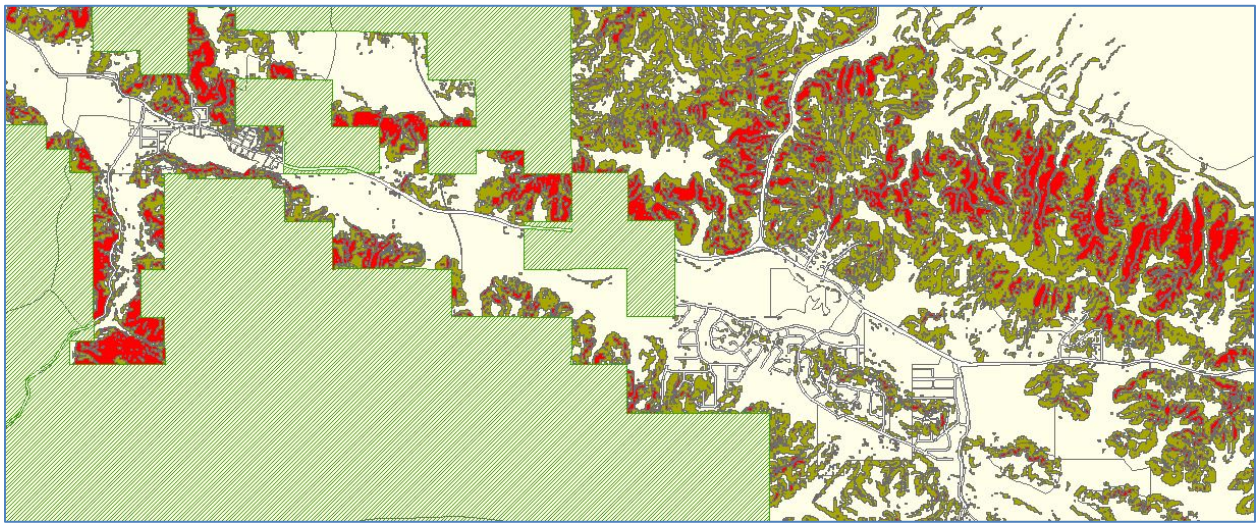
[3] The main reason for this is that adding thousands of small Hillside Management polygons to the GIS layer created a very large file. Since no Residential units are considered in Open Space categories, it was decided to take those Hillside Management areas out as is seen in the Altadena screenshot. Doing this made the data layers easier to process.

Figure 2.A

Land Use Policy - aggregated parcels

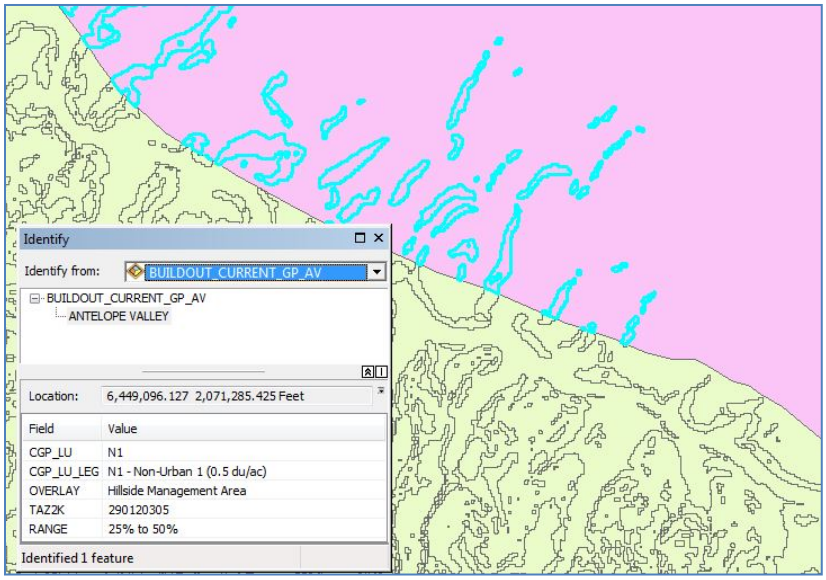


Incorporated Hillside Management and Slopes (note Open Space / National Forest clipped out)



Similar to how the GIS layer is set up for the Existing Conditions (Figure 1.D), the figure below shows the GIS layer for the Current Conditions. Land Use is aggregated per TAZ (representing the different colors in Figure 2.B). The blue outline below is a selected aggregated polygon along with a pop-up window of the fields in the GIS data. Please also note, that unlike the Existing Conditions, this has additional information as to whether this is a 'Hillside Management' area, and what type of slope it is.

Figure 2.B



With this GIS layer now prepared, factors were established for each of the Land Use Categories in order to begin the calculations for the buildout.

Factors

Assumptions for density and floor area ratio were developed in response to development standards in the Antelope Valley Area Plan. Housing projections assume that most areas will develop at 80 percent of the maximum density, with exceptions for designations of no more than one unit per acre, which are expected to buildout at the maximum density. Population projections were established by applying County-determined person per household assumptions for single-family and multifamily housing types. Wherever possible, employment assumptions (using square feet per employee) were provided by the Natelson Company Employment Density Study (see Appendix C). Employment estimates for public uses, such as Public Facilities, Public/Quasi-Public, and Institutions, were determined individually to reflect existing uses.

Residential development on county land was builtout based on 80 percent of the maximum residential density, with an exception for densities of no more than 1 unit per acre which may build out at the maximum. See Appendix A for a list of all of the factors per Land Use category.

Once the factors are calculated for the various land uses, the following formulas can be applied to arrive at the final numbers:

1. Units - Single-Family and Multi-Family Units were calculated using the factors in the 'Target Density' and 'MF vs. SF' fields in Appendix A.

a) The factors in the 'Target Density' field were multiplied by the total Acres for each aggregated land use polygon. The 'MF vs. SF' field is used to determine which Density factor to use.

b) There are certain higher density residential land use categories that should have both single-family and multi-family factors considered. For example, some categories show a "split 50/50" value in the 'MF vs. SF' field (Appendix A), so for those aggregated land use polygons, acreage is multiplied by the single-family density then divided by two; same for the multi-family density.

c) For land use designations with an Urban or a rural mixed use category, a further reduction will need to be done to account for a split between residential and commercial. Usually, this is a 50% split between the two, and 50% is used in the 'Formulas' example below.

d) Add Single-Family and Multi-Family Units together for Total Units

Formulas:

(Acres) x (Density SF) = Single-Family Units

(Acres) x (Density MF) = Multi-Family Units

(Acres) x (Density SF / 2; Density MF / 2) = Single / Multi-Family splits

[for Mixed Use categories – 50/50 split in example below]

(Acres / 2) x (Density SF; Density MF) = Single / Multi-Family residential / commercial reductions

(Single-Family Units) + (Multi-Family Units) = Total Units

2. Population - Single-Family and Multi-Family Population figures were derived by multiplying the Single-Family and Multi-Family Units by the 'Persons per Household' (PPH) figures that are in Appendix A.

a) Consult the 'MF vs. SF' field to see whether the Single-Family or Multi-Family populations should be calculated.

b) For land use designations with target densities that could accommodate both Single-Family and Multi-Family housing, a PPH factor of 3.60 was used. This PPH factor is an average of 3.85 and 3.34 PPH, reflecting both an assumption of 50/50 SF and MF mix in that designation, and the assumption that household sizes are bigger in lower density multifamily projects than the 2.79 PPH factor for higher density Multi-Family projects.

Formulas:

(Units SF) * (PPH_SF) = Single-Family Population - *includes those with '50/50 split'*

(Units MF) * (PPH_MF) = Multi-Family Population - ***includes those with '50/50 split***

(Single-Family Population) + (Multi-Family Population) = Total Population

3. Building Square Footage - Target Floor Area Ratio (FAR) factors were used to determine Building Square Footage, which will then determine Employment. The 'Target FAR' field shown in the table in Appendix A has these factors for the non-residential land use categories, and these are simply multiplied by the total square footage of the aggregated land use polygons. For Mixed Use categories, these figures need to be reduced based on a split between Residential and Commercial (usually 50 / 50)

Formula:

(Area) x (FAR) = Building Square Footage

[for Mixed Use categories – 50/50 split in example below]

(Area / 2) x (FAR) = Building Square Footage

4. Employment[4] – Employment is calculated in one of two ways:

   a) Employment was generated one way by using the Building Square Footage calculations from the previous step.

   Formula:

   (Building Square Footage) / (Square Foot per Emp) = Employment

   b) Some areas have specific employment factors. A field was added in the GIS layer to indicate whether a factor was applied to a general use, or whether a specific number of employees was determined by either contacting the factility, or getting the information through a Census site, or other online resource. Below are the different employment categories and their factors. For the 'Specific Employment Factors', please refer to the table in the 'Existing Conditions' section (Figure 1.F) for these uses.

[4] For more about Employment, please see section 5 on page 18

Figure 2.D

Employment Category	**Employment Factory**
Commercial - General, Neighborhood, Rural	TPC factor - 511
Commercial - Major, Regional	TPC factor - 2437
Commercial - Office, Business Park	TPC factor - 302
Industrial	TPC factor - 1306
Specific Employment Number	Specific Employment Number

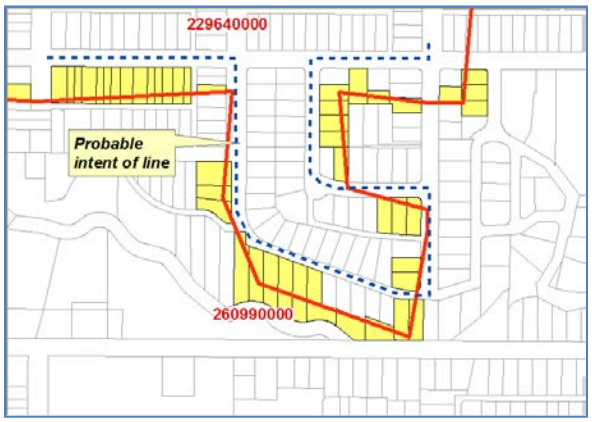
3. Proposed Conditions (Proposed AV Plan)

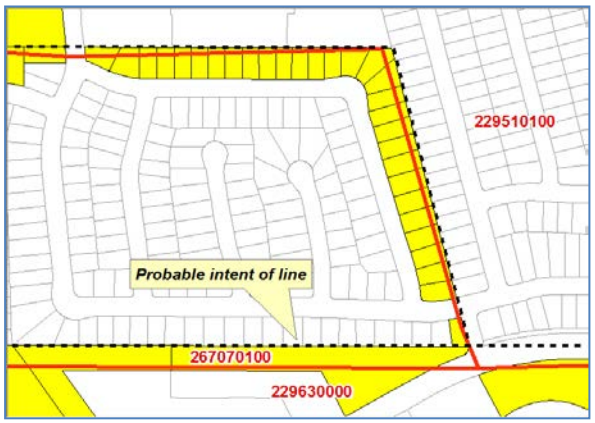
For the Proposed Conditions, the Land Use Policy from the Proposed AV Plan was used to generate the units, population, and employment figures using the same method described in Steps 1-4 in the 'Current Conditions (Adopted Antelope Valley Plan)' section. Since those steps are already written out, they will not be repeated here (to see the factors used for the Proposed AV Plan, please refer to Appendix B).

4. Accuracy of TAZ Layer vs. Parcels Layer

The TAZ layer from SCAG's 2008 "Regional Transportation Plan" was used for the duration of the Buildout iterations. At one point it was discussed to possibly use the 2010 or 2012 TAZ layers as they became available, but for purposes of consistancy, it was decided to keep the 2008 layer throughout. It should be noted that the 2008 GIS layer didn't line up with parcels in most areas. The TAZ data layer wasn't meant to line up with parcels, since the RTP covered a large, 6-county area, and it meant to follow 2000 Census geographies. Below in Figure 4.A are some screenshots that show how the lines cut through the parcels, and also a line showing where the line probably meant to go. Ideally it would have been best to update the TAZ linework to better follow parcels, however it would have been a very time consuming process requiring a lot of hours of manual updating.

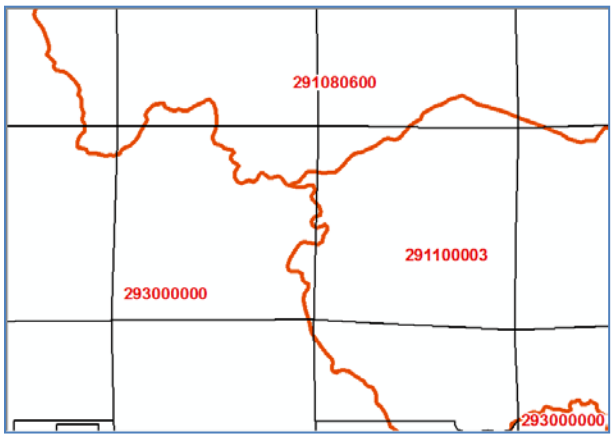
Figure 4.A

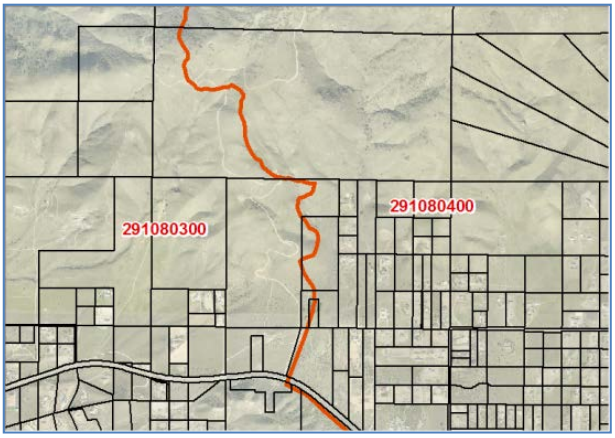




Additionally, there are many areas where TAZ boundaries are not meant to follow parcels at all. Mainly these occur in the National Forest, rural areas, or other areas of large, undeveloped land.

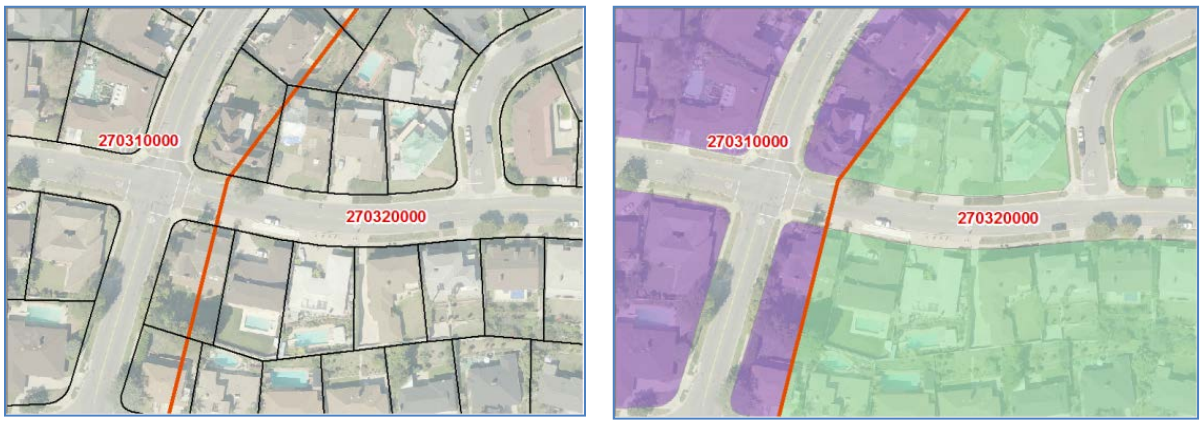
Figure 4.B





The best approach to take with this when aggregating the parcels by TAZ was to simply incorporate the split in the parcels into the data. So, if a parcel is 20% in one TAZ, and 80% in another, the parcel was simply split and aggregated based on those percentages (ie. 80% of the population / units / employment go in one TAZ, and 20% go into the other). In Figure 4.C below, the parcels are split by two TAZ's, then aggregated based on that split. This was discussed between Placeworks and DRP and it was decided that it was okay to do this, given the fact that there wasn't enough time or resources to fix the source TAZ layer, and that this was not meant to be a parcel level analysis...rather, a TAZ-level analysis.

Figure 4.C



5. Employment

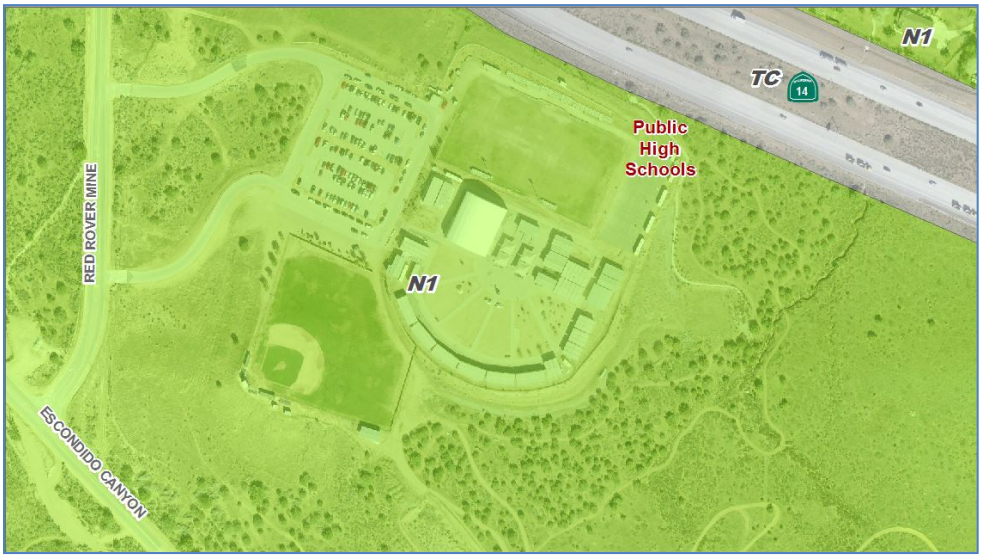
As was mentioned previously, there are Employment factors that are determined by dividing the 'Building Square Footage' by 'Square Footage per Employee', and there are also those that are determined by a specific factor depending on type of employment generator (please see Figure 1.F). In most cases these 'specific factors' correspond with a 'Public', 'Open Space', 'Commercial', or other similar category. However, it is possible that there are some residential land use categories that have some of these employment generating uses as well. A 'Land Types' GIS layer was used to determine all of the 'Use Types' in Figure 1.F, and was integrated into all of the Buildout layers (Existing, Current, and Proposed).

1. Current Conditions - Since Current Conditions are based on Adopted Land Use, there are several residential areas that have an employment generating use. The reason for this was that the older plans like the 1986 Antelope Valley Plan allowed for certain "public uses" within residential land use categories. The following excerpt is from the 1980 General Plan land use element:

   "Within the generalized residential areas mapped, a variety of use types and intensities presently exist. Such uses typically include local commercial and industrial services, schools, churches, local parks and other community-serving public facilities."

So, it's not abnormal to see examples like what is shown in Figure 5.A where a school shows up in a rural residential land use category.

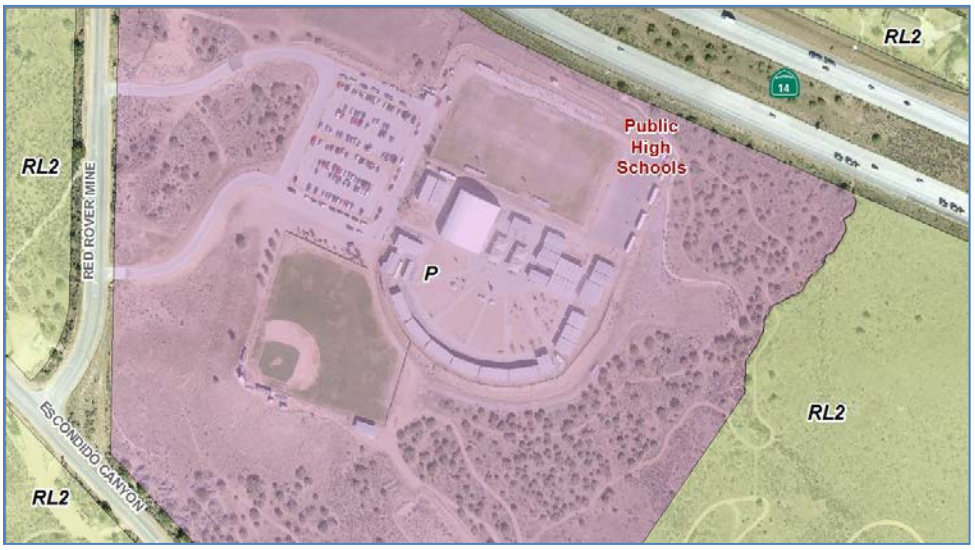
Figure 5.A



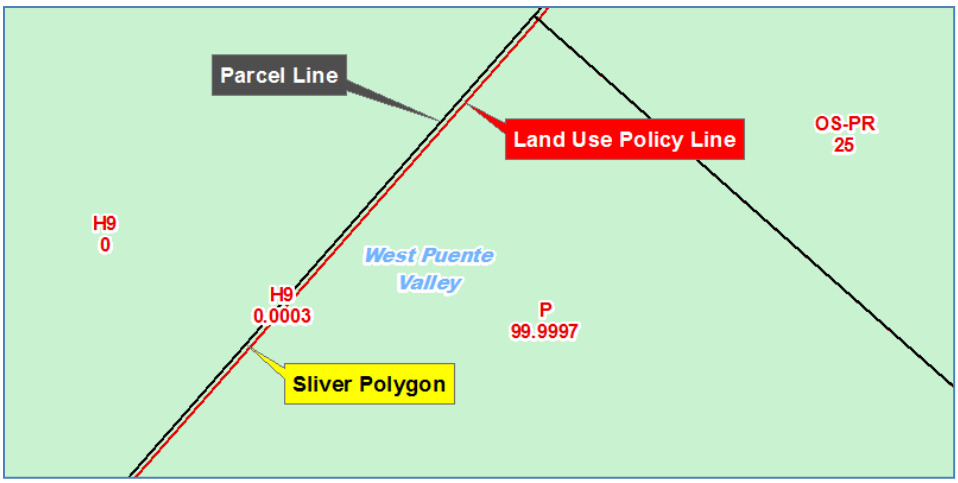
2. Proposed Conditions - Since the proposed land use for the Proposed AV Plan is parcel based, all the publically-owned land that have employment generating

uses should be coded as either "Public / Semi-Public" or "Open Space". So, in the case of Figure 5.A above, that school now has a 'P' category and is no longer rural residential. Most of the cases in which an employment figure shows up in a proposed residential land use category are those of Private and Charter Schools. Since these are not considered a "Public" use, they have a residential category and therefore, have an employment number.

Figure 5.B



3. <u>Sliver Polygons</u> - The other instance where there may be an employment number in a residential category is when the Land Use Policy layer doesn't quite line up with the parcels (where the 'Land Types' GIS layer was derived from). This creates "sliver polygons", and is a common issue whenever doing any overlay analysis with parcels. Given the volume of these sliver polygons and the time constraints, these slivers were left in the buildout.



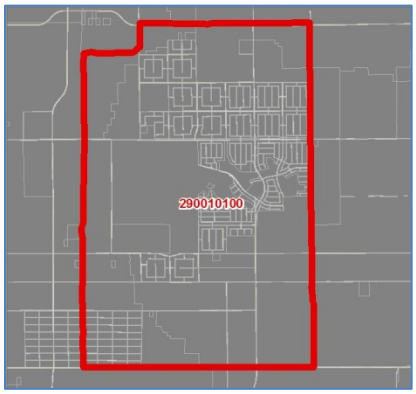
6. TAZ Update and export of GIS layers

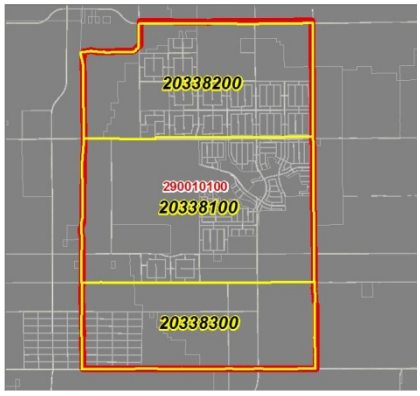
Once the GIS analysis was done, the data was then re-allocated based on the needs of the consultants or sub-consultants, and most were then organized into spreadsheets. The spreadsheets were helpful so that consultants who did not have GIS software could work with the data. <u>All three datasets</u> (existing, current general plan, and proposed general plan) were allocated and exported in the following ways:

1. **<u>TAZ Update.</u>** When the Antelope Valley buildout was originally produced along with the General Plan buildout beginning in 2011, the only TAZ data available was SCAG's 2008 layer. In 2012 they updated their TAZ layer to be more accurate and have a higher level of detail. The screenshot below compares the 2008 version vs. the 2012 version. A GIS model was created to update the buildout datasets to use the 2012 TAZ geographies.

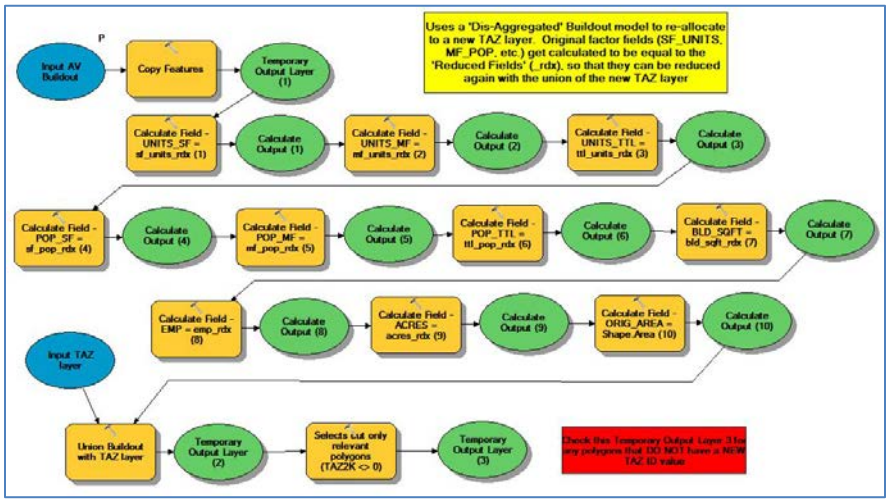
Figure 6.A

2008 TAZ layer *2012 TAZ layer*



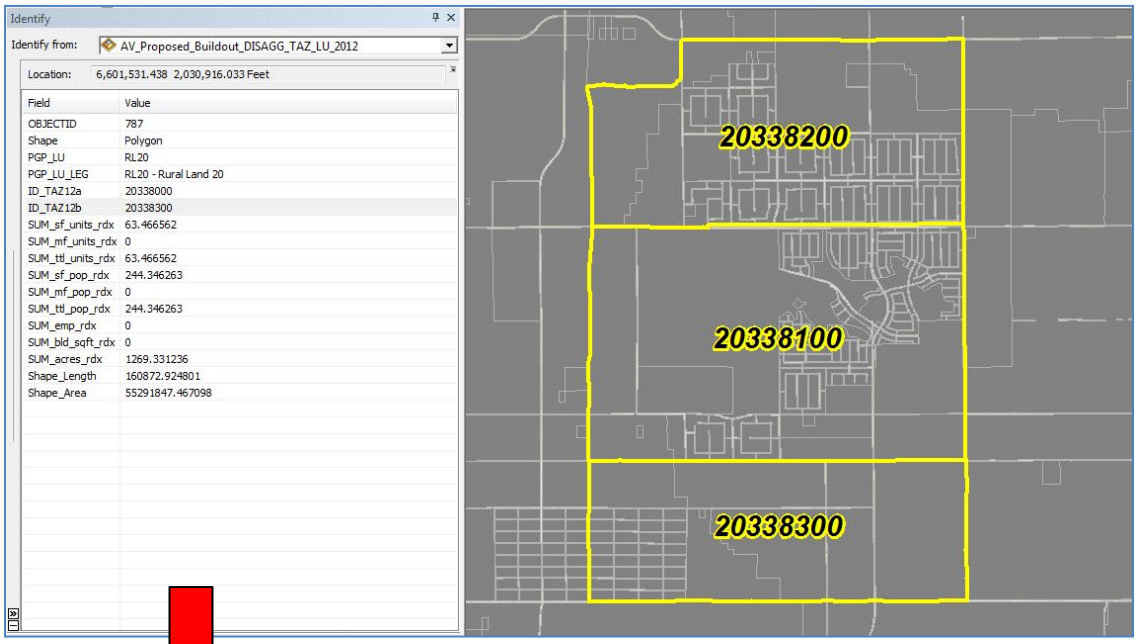


GIS model that updated the buildout to updated 2012 TAZ layer



2. **<u>TAZ / Land Use level.</u>** Following the TAZ geography update, datasets were exported at the level of TAZ <u>and</u> land use. In Figure 6.B below, a few sample TAZ polygons from the GIS layer are shown along with a view of the data, and the extracted spreadsheet. Please note that in the screenshot of the spreadsheet, that the selected rows represent one TAZ; the multiple rows within <u>each</u> TAZ represents different land use categories.

Figure 6.B



	A	B	C	D	E	F	G	H	I	J	K	L
1	Proposed Land Use	TAZ 2012 - Tier 1	TAZ 2012 - Tier 2	Dwelling Units (Single-Family)	Dwelling Units (Multi-Family)	Dwelling Units (Total)	Population (Single-Family)	Population (Multi-Family)	Population (Total)	Jobs	Building Floor Area (sq ft)	Acres
425	RL10 - Rural Land 10	20338000	20338200	4	0	4	17	0	17	0	0	44
426	RL2 - Rural Land 2	20338000	20338200	727	0	727	2,800	0	2,800	0	0	1,455
427	RL20 - Rural Land 20	20338000	20338200	56	0	56	216	0	216	0	0	1,125
428	RL5 - Rural Land 5	20338000	20338200	0	0	0	0	0	0	0	0	0
429	RL10 - Rural Land 10	20338000	20338300	251	0	251	968	0	968	0	0	2,514
430	RL20 - Rural Land 20	20338000	20338300	63	0	63	244	0	244	0	0	1,269
431	ML - Military Land	20339000	20339100	0	0	0	0	0	0	0	0	19,567
432	OS-BLM - Bureau of Land Management	20339000	20339100	0	0	0	0	0	0	0	0	5
433	RL20 - Rural Land 20	20339000	20339100	65	0	65	252	0	252	0	0	1,308
434	CR - Rural Commercial	20340000	20340100	0	0	0	0	0	0	53	26,922	2
435	OS-BLM - Bureau of Land Management	20340000	20340100	0	0	0	0	0	0	0	0	280
436	OS-C - Conservation	20340000	20340100	0	0	0	0	0	0	0	0	22
437	OS-PR - Parks and Recreation	20340000	20340100	0	0	0	0	0	0	50	0	3,113
438	RL10 - Rural Land 10	20340000	20340100	77	0	77	297	0	297	0	0	771
439	RL2 - Rural Land 2	20340000	20340100	202	0	202	776	0	776	0	0	403

3. After all the GIS layers were prepared, and all of the relevant spreadsheets were exported, they were all put on the Department of Regional Planning's FTP site to be downloaded by EIR consultants and other parties that were helping with this project.

Appendix A

Land Use Plan Category	Target Density	Target FAR[1]	MF vs SF	PPH	SF/Emp[2, 3]	NOTES:
Antelope Valley Area Plan						
C - Commercial	n/a	0.5			511	
M - Industry	n/a	0.5			1306	
N1 - Non-Urban 1 (max 0.5 du/gross ac)	0.5	n/a	SF	3.85		
N2 - Non-Urban 2 (max 1.0 du/gross ac)	1.0	n/a	SF	3.85		
O - Open Space	n/a	n/a				
O-NF - National Forest	n/a	n/a				
O-W - Water Body	n/a	n/a				
P - Public Service Facilities	n/a	0.5				individually estimated; assumed 0.5 for public/institutional categories.
Airport	n/a	n/a				individually estimated (under Public Facilities in "Resources" spreadsheet); Designation applies to Palmdale Airport property.
U1 - Urban 1 (0 to 3.3 du/gross ac)	2.6	n/a	SF	3.85		
U1.5 - Urban 1.5 (0 to 2.0 du/gross ac)	1.6	n/a	SF	3.85		
U2 - Urban 2 (0 to 6.6 du/gross ac)	5.3	n/a	SF	3.85		
U2-D (0 to 4 du/gross ac)	3.2	n/a	SF	3.85		
Urban 3 (0 to 15.0 du/gross ac)	12.0	n/a	split 50/50	3.6		
U3-D (0 to 10 du/gross ac)	8.0	n/a	split 50/50	3.6		
Urban 4 (15.1 du/gross acre and greater)	15.1	n/a	split 50/50	3.6		
Additional assumptions (HMAs)						
Hillside Management Areas (HMAs): 25% to 50% slope (Max 1 du/ 2 acres)	0.5	n/a	SF	3.85		
Hillside Management Areas (HMAs): Greater than 50% slope (Max 1 du / 20 acres)	0.05	n/a	SF	3.85		

[1] For non-residential designations, FAR is assumed to be the larger of either: the highest FAR value of the range of existing conditions OR the GP assumption, when applicable. Some non-residential uses have specific assumptions as provided by a specific plan or the County.

[2] For residential designations density is generally assumed to be 80% of the maximum density unless the maximum density less than one unit per acre, in which case the maximum density it used.

[3] Yellow highlighted background indicates that the Community Plan does not specify density/intensity so General Plan assumptions were used. It may also indicate an assumption provided directly from County staff.

Appendix B

Land Use Plan Category	Target Density	Target FAR	MF vs SF	PPH	SF/Emp	NOTES:
Proposed Antelope Valley Plan						
Rural						
Rural Land 1	1.0	n/a	SF	3.85	n/a	While there is an allowance of FAR 0.5 to account for agricultural and other non-residential uses permitted in the RL categories, the buildout model uses the target densities for buildout.
Rural Land 2	0.5	n/a	SF	3.85	n/a	
Rural Land 5	0.2	n/a	SF	3.85	n/a	
Rural Land 10	0.1	n/a	SF	3.85	n/a	
Rural Land 20	0.1	n/a	SF	3.85	n/a	
Rural Land 40	0.03	n/a	SF	3.85	n/a	
Residential						
Residential 2	1.6	n/a	SF	3.85	n/a	
Residential 5	4.0	n/a	SF	3.85	n/a	
Residential 9	7.20	n/a	SF	3.6	n/a	
Residential 18	14.4	n/a	split 50/50	3.6	n/a	
Residential 30	24.0	n/a	MF	2.79	n/a	
Residential 50	40.0	n/a	MF	2.79	n/a	
Residential 100	80.0	n/a	MF	2.79	n/a	
Residential 150	120.0	n/a	MF	2.79	n/a	
Commercial						
Rural Commercial	n/a	0.25	n/a	n/a	511	
General Commercial	n/a	0.5	n/a	n/a	511	residential densities in CG and CM; however, for the purposes of the buildout model, we used the FAR, under the assumption that the general intended use of these land use designations are commercial uses.
Major Commercial	n/a	1.5	n/a	n/a	2437	
Industrial						
Light Industrial	n/a	0.5	n/a	n/a	1306	
Heavy Industrial	n/a	0.5	n/a	n/a	1306	
Office and Professional	n/a	1.0	n/a	n/a	302	
Mixed Use						
Rural Mixed Use	4.0	0.25	split 25/75	3.85	511	
Mixed Use	120.0	1.5	MF	2.79	511	
Public						
Public and Semi-Public Facilities	n/a	1.5			indiv	individually estimated
Open Space						
Open Space Conservation	n/a	0.0	n/a	n/a	n/a	
Open Space Parks and Recreation	n/a	0.0	n/a	n/a	n/a	
Open Space National Forest	n/a	0.0	n/a	n/a	n/a	
Bureau of Land Management	n/a	0.0	n/a	n/a	n/a	
Water	n/a	0.0	n/a	n/a	n/a	
Mineral Resources	n/a	0.0	n/a	n/a	n/a	
Military	n/a	0.0	n/a	n/a	n/a	

Appendix C

Employment assumptions were chosen by Placeworks using the Natelson Company Employment Density Study for the SCAG region for 2001. The full document of the study can be found here:

http://www.mwcog.org/uploads/committee-documents/bl5aX1pa20091008155406.pdf

The following is an excerpt from that document, first Section I. the Introduction, then Section V. the Employment Density Data. Within Section V, the Table 4B shows some of the "Square Feet / Employee" factors used in this buildout:

I. INTRODUCTION

The objective of this study is to derive employment density factors for use in the Small Area Allocation Model (SAAM) currently being developed by the Southern California Association of Governments (SCAG). Specifically, the study has estimated employment densities for ten major land use categories. For purposes of this study, an employment density factor is defined as the number of employees per square feet of building space and acres of land. As detailed in this report, the consultant has utilized a "multi-step" approach to derive these employment density factors. Figure 1 on the following page provides a diagrammatic summary of the study process.

Section II of this report provides an executive summary of the major findings of the study. Section III provides the findings of an extensive review of previous

studies/papers on employment density factors. Section IV provides an overview of the study methodology. Finally, Section V provides the estimated employment density factors derived by the study. Where possible, all findings are presented both at the individual county level and for the overall six-county region. The appendices fully document the technical/statistical analysis employed in this study.

V. EMPLOYMENT DENSITY DATA

Tables 1 through 14 provide the final employment density factors, measured in terms of square feet of building space per employee, for each of 10 land use categories. The employment density factors are presented for each individual county and the entire SCAG region in two formats:

1. One based on the median employees per acre density and the median FAR; and

2. One based on the weighted average of employees per acre density and the weighted average FAR.

In addition, the tables also separate out the two different sets of parcel records as described in section IV. The tables labeled "NARROW POLYGON SELECTION" include data from the first set of parcel records, ones that were in polygons with employment densities (measured in terms of employees per acre) around the mean. The tables labeled "BROAD POLYGON SELECTION" include data from the second set of parcel records, ones that were in a completely random set of polygons.[4]

The tables provide the following key information for each land use category.

1. **Number of records**: the total number of parcel records that the FAR was calculated from.

2. **FAR**: The ratio of building area and land area (measured in terms of square feet). Presented as the median FAR and the weighted average FAR.

3. **Employees per Acre**: the ratio of employees and total acres of land. Presented as the median employees per acre and the weighted average employees per acre.

4. **Net Gross Adjustment Factor**: factor to "net out" roads and other non-building related areas that were included in the polygons, which provided the area acreages in the employees per acre density factors.

5. **Building Efficiency**: factor utilized to exclude any non-work related space in a building (i.e., common areas).[5]

[4] For Imperial County the Assessor's office does not include building area and land area in parcel records. Therefore, in order to calculate employment density factors for Imperial county we relied upon FAR data from rural areas in Riverside and San Bernardino Counties. This prevented us from providing Imperial County employment density factors in the two formats—narrow and broad—since they had to be combined to generate an adequate sample size of parcel records.

[5] These factors were derived from previous retail, office, and industrial development projects that the consultant has completed. They should be regarded as rough estimates of building efficiency factors, not definitive factors that apply to every type of retail, office, or industrial building spaces.

6. **<u>Square Feet per Employee</u>**: the product of square feet per employee (the reciprocal of employees per acre, converted to square feet), the FAR, the Net Gross Adjustment Factor, and the Building Efficiency Factor.

Table 1A
Derivation of Square Feet per Employee Based on:
--MEDIAN EMPLOYEES PER ACRE
--MEDIAN FAR
FIVE COUNTY REGION Net/Gross Adjustment Factor: 0.75

Land Use Category	# of Records	FAR	Employees/ Acre	Building Efficiency	Square Feet/ Employee
Regional Retail	27	0.59	14.99	0.80	1,023
Other Retail/Svc.	1013	0.28	13.49	0.85	585
Low-Rise Office	349	0.36	22.91	0.90	466
High-Rise Office	46	1.19	116.32	0.90	300
Hotel/Motel	16	0.61	11.04	N/A	1,804
R & D/Flex Space	70	0.31	18.13	0.95	527
Light Manufacturing	1047	0.35	11.63	0.95	924
Heavy Manufacuring	0	--	17.05	N/A	--
Warehouse	121	0.42	10.63	0.95	1,225
Government Offices	32	0.37	16.23	0.90	672

Table 2A
Derivation of Square Feet per Employee Based on:
--AVERAGE EMPLOYEES PER ACRE
--AVERAGE FAR
FIVE COUNTY REGION Net/Gross Adjustment Factor: 0.75

Land Use Category	# of Records	FAR	Employees/ Acre	Building Efficiency	Square Feet/ Employee
Regional Retail	27	0.65	19.71	0.80	857
Other Retail/Svc.	1013	0.27	21.98	0.85	344
Low-Rise Office	349	0.43	43.95	0.90	288
High-Rise Office	46	1.86	175.49	0.90	311
Hotel/Motel	16	1.17	33.07	N/A	1,152
R & D/Flex Space	70	0.23	20.53	0.95	344
Light Manufacturing	1047	0.25	17.83	0.95	439
Heavy Manufacuring	0	--	31.14	N/A	--
Warehouse	121	0.30	11.40	0.95	814
Government Offices	32	0.46	51.67	0.90	261

Table 1B
Derivation of Square Feet per Employee Based on:
--MEDIAN EMPLOYEES PER ACRE
--MEDIAN FAR
FIVE COUNTY REGION Net/Gross Adjustment Factor: 0.75

Land Use Category	# of Records	FAR	Employees/ Acre	Building Efficiency	Square Feet/ Employee
Regional Retail	24	0.46	14.99	0.80	798
Other Retail/Svc.	445	0.39	13.49	0.85	813
Low-Rise Office	222	0.47	22.91	0.90	600
High-Rise Office	35	1.14	116.32	0.90	289
Hotel/Motel	6	0.45	11.04	N/A	1,333
R & D/Flex Space	45	0.36	18.13	0.95	609
Light Manufacturing	695	0.41	11.63	0.95	1,089
Heavy Manufacuring	1	0.89	17.05	N/A	1,700
Warehouse	50	0.44	10.63	0.95	1,274
Government Offices	10	0.47	16.23	0.90	843

Table 2B
Derivation of Square Feet per Employee Based on:
--AVERAGE EMPLOYEES PER ACRE
--AVERAGE FAR
FIVE COUNTY REGION Net/Gross Adjustment Factor: 0.75

Land Use Category	# of Records	FAR	Employees/ Acre	Building Efficiency	Square Feet/ Employee
Regional Retail	24	0.71	19.71	0.80	948
Other Retail/Svc.	445	0.41	21.98	0.85	514
Low-Rise Office	222	0.47	43.95	0.90	315
High-Rise Office	35	1.83	175.49	0.90	306
Hotel/Motel	6	0.46	33.07	N/A	459
R & D/Flex Space	45	0.38	20.53	0.95	569
Light Manufacturing	695	0.29	17.83	0.95	501
Heavy Manufacuring	1	0.89	31.14	N/A	931
Warehouse	50	0.35	11.40	0.95	960
Government Offices	10	0.48	51.67	0.90	272

Table 3A
Derivation of Square Feet per Employee Based on:
--MEDIAN EMPLOYEES PER ACRE
--MEDIAN FAR
LOS ANGELES COUNTY Net/Gross Adjustment Factor: 0.75

Land Use Category	# of Records	FAR	Employees/ Acre	Building Efficiency	Square Feet/ Employee
Regional Retail	0	--	18.45	0.80	--
Other Retail/Svc.	431	0.41	15.71	0.85	730
Low-Rise Office	117	0.49	30.75	0.90	471
High-Rise Office	29	2.00	156.07	0.90	377
Hotel/Motel	7	0.62	17.14	N/A	1,179
R & D/Flex Space	3	1.40	25.31	0.95	1,717
Light Manufacturing	327	0.55	14.17	0.95	1,214
Heavy Manufacuring	0	--	42.95	N/A	--
Warehouse	8	0.62	12.65	0.95	1,518
Government Offices	5	1.25	16.78	0.90	2,182

Table 4A
Derivation of Square Feet per Employee Based on:
--AVERAGE EMPLOYEES PER ACRE
--AVERAGE FAR
LOS ANGELES COUNTY Net/Gross Adjustment Factor: 0.75

Land Use Category	# of Records	FAR	Employees/ Acre	Building Efficiency	Square Feet/ Employee
Regional Retail	0	--	18.86	0.80	--
Other Retail/Svc.	431	0.39	25.76	0.85	424
Low-Rise Office	117	0.60	55.28	0.90	319
High-Rise Office	29	3.60	240.77	0.90	440
Hotel/Motel	7	1.21	51.91	N/A	--
R & D/Flex Space	3	1.31	22.61	0.95	1,796
Light Manufacturing	327	0.49	18.49	0.95	829
Heavy Manufacuring	0	--	48.18	N/A	--
Warehouse	8	0.63	12.96	0.95	1,518
Government Offices	5	3.12	63.63	0.90	1,442

Table 3B
Derivation of Square Feet per Employee Based on:
--MEDIAN EMPLOYEES PER ACRE
--MEDIAN FAR
LOS ANGELES COUNTY Net/Gross Adjustment Factor: 0.75

Land Use Category	# of Records	FAR	Employees/ Acre	Building Efficiency	Square Feet/ Employee
Regional Retail	13	0.78	18.45	0.80	1,102
Other Retail/Svc.	228	0.47	15.71	0.85	836
Low-Rise Office	82	0.51	30.75	0.90	487
High-Rise Office	28	2.22	156.07	0.90	418
Hotel/Motel	3	0.46	17.14	N/A	877
R & D/Flex Space	10	0.56	25.31	0.95	688
Light Manufacturing	216	0.47	14.17	0.95	1,040
Heavy Manufacuring	1	0.89	42.95	N/A	675
Warehouse	20	0.45	12.65	0.95	1,094
Government Offices	1	1.57	16.78	0.90	2,745

Table 4B
Derivation of Square Feet per Employee Based on:
--AVERAGE EMPLOYEES PER ACRE
--AVERAGE FAR
LOS ANGELES COUNTY Net/Gross Adjustment Factor: 0.75

Land Use Category	# of Records	FAR	Employees/ Acre	Building Efficiency	Square Feet/ Employee
Regional Retail	13	1.76	18.86	0.80	2,437
Other Retail/Svc.	228	0.47	25.76	0.85	511
Low-Rise Office	82	0.56	55.28	0.90	299
High-Rise Office	28	2.50	240.77	0.90	305
Hotel/Motel	3	0.47	51.91	N/A	298
R & D/Flex Space	10	1.36	22.61	0.95	1,862
Light Manufacturing	216	0.45	18.49	0.95	749
Heavy Manufacuring	1	0.89	48.18	N/A	602
Warehouse	20	0.49	12.96	0.95	1,172
Government Offices	1	1.57	63.63	0.90	724