

*Appendix B*  
*2013 Notice of Preparation (NOP) and Responses*

## Appendices

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# REVISED NOTICE OF PREPARATION (NOP)

## County of Los Angeles, Department of Regional Planning

**Project Title:** Los Angeles County General Plan Update

**Introduction:** The County of Los Angeles will be the Lead Agency and will prepare an environmental impact report for the comprehensive update of the Los Angeles County General Plan. The project includes goals, policies, implementation programs and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The project will replace the adopted General Plan.

The County released the NOP for a public review period of 30 days for this process from August 1, 2011 to August 31, 2011. The project description in the August 1, 2011 NOP included an update to the General Plan (excluding the Housing Element) and an update to the Antelope Valley Area Plan. This notice advises interested parties and responsible agencies that the project description has been revised to exclude the Antelope Valley Area Plan Update. The revisions to the proposed project result in changes to the scope of the upcoming EIR from what was previously identified in the August 1, 2011 NOP. An EIR for the Antelope Valley Area Plan Update will be processed and noticed separately.

### 1. ENVIRONMENTAL SETTING

#### 1.1 Project Location

Los Angeles County is geographically one of the largest counties in the country with approximately 4,083 square miles. The County stretches along 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange County and San Bernardino County, to the north by Kern County, and to the west by Ventura County. The County also includes two offshore islands, Santa Catalina Island and San Clemente Island, as shown in Figure 1, *Regional Location*. The unincorporated areas account for approximately 65 percent of the total land area of the County.

The unincorporated areas in the northern portion of the County are covered by large amounts of sparsely populated land and include the Angeles National Forest, part of the Los Padres National Forest, and the Mojave Desert. The unincorporated areas in the southern portion of the County consist of 58 noncontiguous land areas, which are often referred to as the County's unincorporated urban islands. The County's governmental structure comprises five Supervisorial Districts with the Los Angeles County Board of Supervisors as the governing body responsible for making all legislative land use decisions for the unincorporated areas. Maps of the Supervisorial Districts and unincorporated areas of the County are available online on the Department of Regional Planning's website: <http://planning.lacounty.gov/generalplan>.

#### 1.2 General Plan and Planning Areas Framework

The Los Angeles County General Plan is the guide for growth and development for the unincorporated areas of Los Angeles County. The General Plan guides the long-term physical development and conservation of the County's land and environment through a framework of goals, policies, and implementation programs. The California Government Code requires that each city and county adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning." Long-range planning provides the opportunity to responsibly manage and direct future development, conserve natural areas, support economic development objectives, and improve mobility in the region.

The Los Angeles County General Plan serves as the framework for existing community-based plans, including Area Plans, Community Plans, Neighborhood Plans, and Local Coastal Land Use Plans. Area Plans provide additional details to General Plan goals and policies, focusing on subregional land use issues and other policy needs that are specific to the Planning Area. Community Plans and Neighborhood Plans cover smaller geographic areas within the Planning Area, and address neighborhood and/or community level land use policy issues. Local Coastal Land Use Plans are components of the Local Coastal Program (LCP), which consist of land use plans, zoning ordinances and maps, and implementing actions to protect coastal resources within the state designated coastal zone. All community-based plans are components of the General Plan and must be consistent with General Plan goals and policies. The following is a list of adopted community-based plans:

#### Area Plans

- Antelope Valley Area Plan (adopted 1986)
- Santa Clarita Valley Area Plan (adopted 1984; updated 2012)
- Santa Monica Mountains North Area Plan (adopted 2000)

#### Community Plans

- Altadena Community Plan (adopted 1986)
- East Los Angeles Community Plan (adopted 1988)
- Hacienda Heights Community Plan (adopted 1978; updated 2011)
- Rowland Heights Community Plan (adopted 1981)
- Twin Lakes Community Plan (adopted 1991)
- Walnut Park Neighborhood Plan (adopted 1987)
- West Athens-Westmont Community Plan (adopted 1990)

#### Local Coastal Land Use Plans

- Marina del Rey Local Coastal Land Use Plan (adopted; certified Local Coastal Program 1996; updated 2012)
- Malibu Local Coastal Land Use Plan (adopted 1986)
- Santa Catalina Island Local Coastal Land Use Plan (adopted; certified Local Coastal Program 1983)

### **1.3 Adopted General Plan**

The County's efforts to prepare a General Plan for the unincorporated areas began in the 1970's with the creation of the Environmental Development Guide. In 1973, the County adopted its first General Plan, followed by a comprehensive update in 1980. The County's adopted General Plan and community-based plans can be found online at <http://planning.lacounty.gov/plans/adopted>.

## **2. PROJECT DESCRIPTION**

The proposed project is a comprehensive update of the Los Angeles County General Plan. The project includes goals, policies, implementing programs, and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update focuses growth in the unincorporated areas with access to services and infrastructure and reduces the potential for growth in the County's environmentally sensitive and hazardous areas.

### **2.1 Draft General Plan**

The proposed project is the preparation of a comprehensive update of the County's 1980 General Plan that meets California Code requirements for a general plan. The Draft General Plan accommodates new housing and jobs within the unincorporated area in anticipation of population growth in the County and the region through the year 2035. The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County's needs without compromising the ability of future generations to realize their economic, social, and environmental goals. The Draft General Plan has been designed to utilize, promote, and implement policies that promote healthy, livable, and sustainable communities. Five guiding principles—Smart Growth; Sufficient

Community Services and Infrastructure; Strong and Diversified Economy; Environmental Resource Management; and Healthy, Livable and Equitable Communities—are supported by community-identified goals and stakeholder input, and further the overall goal of sustainability throughout the Draft General Plan.

The Draft General Plan consists of the following elements (the update to the Housing Element, which is a component of the General Plan, is underway through a separate effort):

- Land Use Element
- Mobility Element
- Air Quality Element
- Conservation and Open Space Element
- Parks and Recreation Element
- Noise Element
- Safety Element
- Public Services and Facilities Element
- Economic Development Element

To clarify the framework of the General Plan and to facilitate the planning of the unincorporated areas, the Draft General Plan establishes 11 Planning Areas, as shown online at <http://planning.lacounty.gov/generalplan>.

- Antelope Valley Planning Area
- Coastal Islands Planning Area
- East San Gabriel Valley Planning Area
- Gateway Planning Area
- Metro Planning Area
- San Fernando Planning Area
- Santa Clarita Valley Planning Area
- Santa Monica Mountains Planning Area
- South Bay Planning Area
- West San Gabriel Valley Planning Area
- Westside Planning Area

The Draft General Plan provides a framework of goals and policies to achieve countywide planning objectives within the 11 Planning Areas, and serves as the foundation for all existing and future community-based plans. Furthermore, the Draft General Plan involves a revision to the current General Plan land use policy map, and revisions to elements required by the State of California and optional elements. Table 1, *Proposed General Plan*, provides a description of the land uses designations proposed in the Land Use Plan. The following describe the major land use policies in the Draft General Plan, which are supported by goals, policies, programs and strategic changes to the land use policy maps:

**Transit Oriented Districts:** Transit Oriented Districts (TOD) are areas within a 1/2 mile radius from a major transit stop. TOD areas are located in proximity to major transit stops, provide the best opportunities for infill development, and are well-suited for higher density housing, mixed uses, and civic activities. The TODs guide the increase of residential densities and the allowance of mixed uses along major corridors in the draft land use policy maps. All TODs are envisioned in the future to have a TOD specific plan with standards, regulations, and capital improvement plans that tailor to the unique characteristics and needs of each community.

**Special Management Areas:** The County's Special Management Areas require additional development regulations that are necessary to prevent the loss of life and property, and to protect the natural environment and important resources. Special Management Areas include but are not limited to Agricultural Resource Areas, Airport Influence Areas, Seismic Hazard Zones, Flood Hazard Zones, Significant Ecological Areas, Hillside Management Areas, and Very High Fire Hazard Severity Zones. The Draft General Plan minimizes

risks to hazards and limits development in Special Management Areas through goals, policies and programs. The Draft General Plan also includes the Hazard, Environmental, and Resource Constraints Model, which is a visual representation of the Special Management Areas and serves 1) as a tool to inform land use policies for future community-based planning initiatives; 2) to inform applicants and planners of potential site constraints and regulations; and 3) to direct land use policies and the development of planning regulations and procedures to address hazard, environmental, and resource constraints.

**Preservation of Industrial Land:** Planning for future growth and the appropriate land use mix has major impacts on the local and regional economy. The Draft General Plan includes land uses and policies that protect the remaining industrial land in the unincorporated areas. The Draft General Plan identifies Employment Protection Districts, which are economically viable industrial land and employment-rich lands, with policies to prevent the conversion of industrial land to non-industrial uses.

<b>Table 1 Proposed General Plan</b>						
<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
<b>COUNTYWIDE GENERAL PLAN (NOT IN A COMMUNITY PLAN) <sup>2</sup></b>						
<b>PROPOSED GENERAL PLAN</b>	<b>106,621</b>	<b>--</b>	<b>194,142</b>	<b>666,588</b>	<b>561,542</b>	<b>176,161</b>
<b>Commercial</b>	<b>962</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>20,982</b>	<b>41,872</b>
CG - General Commercial	961.14	0.5 (F)	0	0	20,933	41,842
CM - Major Commercial	0.64	1.5 (F)	0	0	42	17
CR - Rural Commercial	0.62	0.25 (F)	0	0	7	13
<b>Industrial</b>	<b>3,560</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>77,531</b>	<b>59,365</b>
IH - Heavy Industrial	1,706	0.5 (F)	0	0	37,167	28,458
IL - Light Industrial	1,853	0.5 (F)	0	0	40,365	30,907
IO - Industrial Office	0	1 (F)	0	0	0	0
<b>Mixed Use &amp; Specific Plan</b>	<b>459</b>	<b>--</b>	<b>19,003</b>	<b>53,019</b>	<b>10,347</b>	<b>38,949</b>
MU - Mixed Use	158	120 (D) / 1.5 (F)	19,003	53,019	10,347	20,249
SP - Universal Studios Specific Plan	301	--	0	0	0	18,700
<b>Open Space</b>	<b>57,374</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,933</b>
OS-BLM - Bureau of Land Management	76	--	0	0	0	0
OS-C - Conservation	7,648	--	0	0	0	0
OS-ML - Military Land	36,615	--	0	0	0	0
OS-MR - Mineral Resources	1,088	--	0	0	0	0
OS-NF - National Forest	2,777	--	0	0	0	0
OS-PR - Parks and Recreation	7,105	--	0	0	0	1,625
OS-W - Water	2,065	--	0	0	0	307
<b>Public / Semi-Public</b>	<b>6,917</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>452,681</b>	<b>29,267</b>
P - Public and Semi-Public	6,917	1.5 (F)	0	0	452,681	29,267
<b>Rural</b>	<b>16,324</b>	<b>--</b>	<b>2,080</b>	<b>8,008.70</b>	<b>0</b>	<b>101</b>
RL40 - Rural Land 40	38	0.03 (D)	1	4	0	0

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
RL20 - Rural Land 20	12,759	0.05 (D)	638	2,456	0	0
RL10 - Rural Land 10	2,247	0.1 (D)	225	865	0	0
RL2 - Rural Land 2	126	0.5 (D)	63	243	0	0
RL1 - Rural Land 1	1,153	1 (D)	1,153	4,440	0	101
<b>Residential</b>	<b>21,025</b>	<b>--</b>	<b>173,058</b>	<b>605,560</b>	<b>0</b>	<b>4,674</b>
H2 - Residential 2	1,462	1.6 (D)	2,340	9,007	0	100
H5 - Residential 5	1,768	4 (D)	7,073	27,229	0	100
H9 - Residential 9	14,394	7.2 (D)	103,640	373,103	0	3,086
H18 - Residential 18	2,469.36	14.4 (D)	35,559	128,011	0	711
H30 - Residential 30	808.31	24 (D)	19,337	53,951	0	427
H50 - Residential 50	117.90	40 (D)	4,716	13,157	0	250
H100 - Residential 100	4.93	80 (D)	395	1,101	0	0
<b>COMMUNITY PLANS <sup>2</sup></b>						
<b>ALTADENA</b>	<b>5,604</b>	<b>--</b>	<b>16,240</b>	<b>61,359</b>	<b>9,996</b>	<b>18,463</b>
<b>Commercial</b>	<b>64</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>2,784</b>	<b>9,376</b>
GC - General Commercial	64	1 (F)	0	0	2,784	9,376
<b>Industrial</b>	<b>38</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>1,004</b>	<b>3,075</b>
BP - Business Park	38	0.6 (F)	0	0	1,004	3,075
<b>Infrastructure</b>	<b>815</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Public Streets	815	--	0	0	0	0
<b>Mixed Use &amp; Specific Plan</b>	<b>255</b>	<b>--</b>	<b>904</b>	<b>2,800</b>	<b>2,226</b>	<b>4,561</b>
MU - Mixed Use "Center"	37	17.6 (D) / 1.4 (F)	642	1,792	2,226	4,411
SP - La Vina Specific Plan	219	--	262	1,008	0	150
<b>Public &amp; Open Space</b>	<b>915</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>3,981</b>	<b>1,066</b>
I - Institutions	183	0.5 (F)	0	0	3,981	803
MOS - Miscellaneous Open Space	68	--	0	0	0	100
NF - National Forest and National Forest Managed Lands	416	--	0	0	0	0
PR - Public and Private Recreation	103	--	0	0	0	164
U - Utilities	145	--	0	0	0	0
<b>Residential</b>	<b>3,516</b>	<b>--</b>	<b>15,335</b>	<b>58,558</b>	<b>0</b>	<b>386</b>
E - Estate/Equestrian	93	0.4 (D)	37	144	0	5
N - Non-Urban	327	1 (D)	105	403	0	0
LD - Low Density Residential	3,068	4.8 (D)	14,726	56,694	0	377
LMD - Low/Medium Density Residential	1	9.6 (D)	12	46	0	0
MD - Medium Density Residential	26	17.6 (D)	456	1,271	0	4

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
<b>ANTELOPE VALLEY AREA PLAN<sup>7</sup></b>	<b>1,132,744</b>	<b>--</b>	<b>278,158</b>	<b>1,070,571</b>	<b>46,870</b>	<b>51,219</b>
<b>Commercial</b>	<b>902</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>19,652</b>	<b>38,329</b>
C - Commercial	902	0.5 (F)	0	0	19,652	38,329
<b>Industrial</b>	<b>579</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>12,606</b>	<b>9,652</b>
M - Industry	579	0.5 (F)	0	0	12,606	9,652
<b>Open Space</b>	<b>583,967</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>524</b>
OS-BLM - Bureau of Land Management	2,436	--	0	0	0	0
O - Open Space	70,471	--	0	0	0	324
O-NF - National Forest	510,413	--	0	0	0	200
O-W - Water Body	648	--	0	0	0	0
<b>Public / Semi-Public</b>	<b>17,029</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>14,613</b>	<b>767</b>
Airport	16,358	--	0	0	0	50
P - Public and Semi-Public Facility	671	1.5 (F)	0	0	14,613	717
<b>Rural</b>	<b>522,077</b>	<b>--</b>	<b>261,773</b>	<b>1,007,826</b>	<b>0</b>	<b>1,361</b>
N1 - Non-Urban 1	502,174	0.5 (D)	242,712	934,440	0	926
N2 - Non-Urban 2	19,903	1.0 (D)	19,061	73,385	0	436
<b>Residential</b>	<b>5,541</b>	<b>--</b>	<b>16,385</b>	<b>62,746</b>	<b>0</b>	<b>485</b>
U1 - Urban 1	4,450	2.6 (D)	11,411	43,931	0	335
U1.5 - Urban 1.5	140	1.6 (D)	224	862	0	0
U2 - Urban 2	738	5.3 (D)	3,248	12,505	0	150
U2-D - Urban 2 (specific development criteria)	50	3.2 (D)	160	614	0	0
U3 - Urban 3	9	12.0 (D)	105	377	0	0
U3-D - Urban 3 (specific development criteria)	155	8.0 (D)	1,238	4,457	0	0
<b>Infrastructure</b>	<b>2,649</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>100</b>
TC - Transportation Corridor	2,649	--	0	0	0	100
<b>EAST LOS ANGELES COMMUNITY PLAN</b>	<b>3,381</b>	<b>--</b>	<b>41,608</b>	<b>128,487</b>	<b>44,199</b>	<b>42,459</b>
<b>Commercial</b>	<b>338</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>21,255</b>	<b>26,156</b>
CC - Community Commercial	150	1.5 (F)	0	0	9,778	19,239
CM - Commercial Manufacturing	93	1.3 (F)	0	0	5,252	4,289
MC - Major Commercial	95	1.5 (F)	0	0	6,225	2,627
<b>Industrial</b>	<b>158</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>6,873</b>	<b>5,234</b>
I - Industrial	158	1 (F)	0	0	6,873	5,234
<b>Mixed Use &amp; Specific Plan</b>	<b>65</b>	<b>--</b>	<b>1,563</b>	<b>4,361</b>	<b>3,404</b>	<b>6,848</b>



**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
CR - Commercial Residential	65	24 (D) / 1.2 (F)	1,563	4,361	3,404	6,848
<b>Other</b>	<b>21</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
RP - Residential Parking	21	--	0	0	0	0
<b>Public &amp; Open Space</b>	<b>582</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>12,667</b>	<b>2,753</b>
P - Public Use	582	0.5 (F)	0	0	12,667	2,753
<b>Residential</b>	<b>2,218</b>	<b>--</b>	<b>40,045</b>	<b>124,127</b>	<b>0</b>	<b>1,469</b>
LD - Low Density Residential	132	6.4 (D)	843	3,246	0	0
LMD - Low/Medium Density Residential	1,045	13.6 (D)	14,207	51,146	0	565
MD - Medium Density Residential	1,041	24 (D)	24,994	69,735	0	904
<b>HACIENDA HEIGHTS COMMUNITY PLAN</b>	<b>6,360</b>	<b>--</b>	<b>17,433</b>	<b>65,833</b>	<b>9,864</b>	<b>13,310</b>
<b>Commercial</b>	<b>131</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>5,708</b>	<b>11,194</b>
CG - General Commercial	131	1 (F)	0	0	5,708	11,194
<b>Industrial</b>	<b>28</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>609</b>	<b>466</b>
IL - Light Industrial	28	0.5 (F)	0	0	609	466
<b>Public &amp; Open Space</b>	<b>1,709</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>3,547</b>	<b>300</b>
OS-C - Open Space Conservation	403	--	0	0	0	0
OS-PR - Open Space Parks and Recreation	1,131	--	0	0	0	200
P-CS - Public and Semi-Public Community Serving	42	0.5 (F)	0	0	651	100
P-TF - Public and Semi-Public Transportation Facilities	0	--	0	0	0	0
P-UF - Public and Semi-Public Utilities and Facilities	133	0.5 (F)	0	0	2,896	0
<b>Rural</b>	<b>862</b>	<b>--</b>	<b>145</b>	<b>559</b>	<b>0</b>	<b>35</b>
RL10 - Rural Lands 10	714	0.1 (D)	71	275	0	0
RL2 - Rural Lands 2	148	0.5 (D)	74	284	0	35
<b>Residential</b>	<b>3,630</b>	<b>--</b>	<b>17,288</b>	<b>65,274</b>	<b>0</b>	<b>1,315</b>
H2 - Residential 2	719	1.6 (D)	1,150	4,429	0	100
H5 - Residential 5	2,110	4 (D)	8,441	32,499	0	1,000
H9 - Residential 9	582	7.2 (D)	4,277	16,466	0	200
H18 - Residential 18	201	14.4 (D)	2,889	10,402	0	15
H30 - Residential 30	10	24 (D)	248	693	0	0
H50 - Residential 50	7	40 (D)	281	785	0	0

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
<b>MALIBU LOCAL COASTAL LAND USE PLAN</b>	<b>51,141</b>	<b>--</b>	<b>4,347</b>	<b>16,729</b>	<b>15,239</b>	<b>22,138</b>
<b>Commercial</b>	<b>729</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>6,352</b>	<b>11,929</b>
12 - Rural Business	18	0.2 (F)	0	0	158	309
13 - General Commercial	0.45	0.2 (F)	0	0	4	8
14 - Office/Commercial Services	0.18	0.2 (F)	0	0	2	5
16 - Low-Intensity Visitor-Serving Commercial Recreation	710	0.2 (F)	0	0	6,187	11,603
17 - Recreation-Serving Commercial	0.20	0.2 (F)	0	0	2	3
<b>Mixed Use &amp; Specific Plan</b>	<b>39</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>336</b>	<b>672</b>
MU - Mixed Use - Specific Plan Required	39	0.2 (F)	0	0	336	672
<b>Public &amp; Open Space</b>	<b>16,423</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>8,551</b>	<b>7,776</b>
11 - Institution and Public Facilities	982	0.2 (F)	0	0	8,551	7,600
18 - Parks	15,441	--	0	0	0	175
<b>Rural</b>	<b>32,945</b>	<b>--</b>	<b>3,298</b>	<b>12,697</b>	<b>0</b>	<b>1,761</b>
M2 - Mountain Land	23,051	0.05 (D)	1,153	4,437	0	1,603
5 - Rural Land III	2,615	0.5 (D)	1,196	4,604	0	120
4 - Rural Land II	3,375	0.2 (D)	603	2,320	0	15
3 - Rural Land I	3,905	0.1 (D)	347	1,336	0	23
<b>Residential</b>	<b>1,005</b>	<b>--</b>	<b>1,049</b>	<b>4,032</b>	<b>0</b>	<b>0</b>
6 - Residential I	903	1 (D)	674	2,595	0	0
8A - Residential III(A)	21	3.2 (D)	31	121	0	0
8B - Residential III(B)	75	4.8 (D)	331	1,273	0	0
9B - Residential IV(B)	5	8 (D)	7	29	0	0
9C - Residential IV(C)	0.47	16 (D)	5	15	0	0
<b>MARINA DEL REY LOCAL COASTAL LAND USE PLAN</b>	<b>694</b>	<b>--</b>	<b>7,684</b>	<b>21,439</b>	<b>1,861</b>	<b>4,493</b>
<b>Commercial</b>	<b>86</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>1,413</b>	<b>4,111</b>
H - Hotel	26	1027 rooms	0	0	0	1,027
MC - Marine Commercial	24	0.5 (F)	0	0	521	1,020
O - Office	5	1 (F)	0	0	235	780
VS/CC - Visitor-Serving / Convenience Commercial	30	0.5 (F)	0	0	656	1,284
<b>Industrial</b>	<b>5</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>112</b>	<b>250</b>
PF - Public Facilities	5	0.5 (F)	0	0	112	250
<b>Other</b>	<b>401</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>82</b>	<b>82</b>
B - Boat Storage	19	0.1 (F)	0	0	82	82

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
P - Parking	17	--	0	0	0	0
W - Water	366	--	0	0	0	0
<b>Public &amp; Open Space</b>	<b>42</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
OS - Open Space	42	--	0	0	0	0
<b>Residential</b>	<b>159</b>	<b>--</b>	<b>7,684</b>	<b>21,439</b>	<b>254</b>	<b>50</b>
R III - Residential III	38	28 (D)	1,063	2,966	0	0
R IV - Residential IV	23	36 (D)	814	2,270	0	0
R V - Residential V	97	60 (D)	5,807	16,202	0	0
SA - Senior Accommodations	2	--	0	0	254	50
<b>ROWLAND HEIGHTS COMMUNITY PLAN</b>	<b>7,422</b>	<b>--</b>	<b>14,115</b>	<b>50,900</b>	<b>12,134</b>	<b>20,661</b>
<b>Commercial</b>	<b>192</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>8,378</b>	<b>15,764</b>
C - Commercial	192	1 (F)	0	0	8,378	15,764
<b>Industrial</b>	<b>144</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>3,756</b>	<b>3,027</b>
I - Industrial	144	0.6 (F)	0	0	3,756	3,027
<b>Other</b>	<b>793</b>	<b>--</b>	<b>723</b>	<b>2,783</b>	<b>0</b>	<b>0</b>
TOS - Transitional Open Space (N1)	272	0.2 (D)	54	210	0	0
TOS - Transitional Open Space (N2)	268	1 (D)	181	695	0	0
TOS - Transitional Open Space (U1)	252	2.56 (D)	488	1,878	0	0
<b>Public &amp; Open Space</b>	<b>1,566</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>194</b>
O - Open Space	1,566	--	0	0	0	194
<b>Residential</b>	<b>4,727</b>	<b>--</b>	<b>13,392</b>	<b>48,117</b>	<b>0</b>	<b>1,676</b>
N1 - Non-Urban 1	1,459	0.2 (D)	292	1,124	0	0
N2 - Non-Urban 2	510	1 (D)	449	1,730	0	200
U1 - Urban 1	1,276	2.56 (D)	2,857	10,998	0	401
U2 - Urban 2	1,278	4.8 (D)	5,903	22,728	0	1,075
U3 - Urban 3	68	9.6 (D)	643	2,477	0	0
U4 - Urban 4	51	17.6 (D)	902	2,517	0	0
U5 - Urban 5	84	28 (D)	2,345	6,543	0	0
<b>SANTA CATALINA ISLAND LOCAL COASTAL LAND USE PLAN</b>	<b>46,137</b>	<b>--</b>	<b>21</b>	<b>0</b>	<b>0</b>	<b>570</b>
<b>Commercial</b>	<b>26</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>
Commercial - Two Harbors	3	--	0	0	0	7
Lodges/Inns - Two Harbors	14	--	0	0	0	0
Marine Commercial - Two Harbors	3	--	0	0	0	0
Utilities/Services - Two Harbors	7	--	0	0	0	0

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
<b>Industrial</b>	<b>690</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>6</b>
Extractive Use - Catalina	514	--	0	0	0	0
Industrial/Transportation - Two Harbors	5	--	0	0	0	0
Industrial/Transportation/Utilities - Catalina	172	--	0	0	0	6
<b>Other</b>	<b>87</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
undefined* - Two Harbors	3	--	0	0	0	0
View Corridor - Two Harbors	84	--	0	0	0	0
<b>Public &amp; Open Space</b>	<b>45,197</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>557</b>
Conservation/Primitive Recreation - Catalina	20,212	--	0	0	0	32
Conservation/Recreation - Two Harbors	820	--	0	0	0	17
Open Space/Recreation - Two Harbors	108	--	0	0	0	2
Open Space/Structured Recreation - Catalina	24,057	--	0	0	0	505
<b>Residential</b>	<b>136</b>	--	<b>21</b>	<b>0</b>	<b>0</b>	<b>0</b>
Residential Land Uses - Two Harbors	136	0.25 (D)	21	0	0	0
<b>SANTA CLARITA VALLEY AREA PLAN<sup>6</sup></b>	<b>270,889</b>	--	<b>77,155</b>	<b>237,638</b>		<b>105,881</b>
<b>Residential</b>	--	--	<b>77,155</b>	<b>237,638</b>	--	--
<b>Non-Residential</b>	--	--	--	--	--	<b>81,265-107,123</b>
<b>SANTA MONICA MOUNTAINS NORTH AREA PLAN</b>	<b>20,162</b>	--	<b>2,441</b>	<b>9,398.95</b>	<b>14,428</b>	<b>6,569</b>
<b>Commercial</b>	<b>166</b>	--	<b>0</b>	<b>0</b>	<b>3,215</b>	<b>5,959</b>
C - Commercial	120	0.5 (F)	0	0	2,604	4,764
CR - Commercial Recreation - Limited Intensity	47	0.3 (F)	0	0	611	1,195
<b>Infrastructure</b>	<b>0</b>	--	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
TC - Transportation Corridor	0	--	0	0	0	0
<b>Public &amp; Open Space</b>	<b>6,651</b>	--	<b>0</b>	<b>0</b>	<b>11,214</b>	<b>73</b>
OS - Open Space	775	--	0	0	0	0
OS-DR - Open Space Deed Restricted	591	--	0	0	0	0
OS-P - Open Space Parks	4,731	--	0	0	0	62
OS-W - Open Space Water	39	--	0	0	0	11
P - Public and Semi-Public Facilities	515	0.5 (F)	0	0	11,214	0
<b>Rural</b>	<b>12,920</b>	--	<b>1,601</b>	<b>6,164</b>	<b>0</b>	<b>537</b>

**Table 1  
Proposed General Plan**

<i>Land Use Designation</i>	<i>Acres<sup>3</sup></i>	<i>Density / Intensity<sup>4</sup></i>	<i>Units</i>	<i>Population<sup>5</sup></i>	<i>Bldg. Sq. Footage (in thousands)</i>	<i>Jobs<sup>5</sup></i>
N20 - Mountain Lands 20	5,505	0.05 (D)	275	1,060	0	16
N10 - Mountain Lands 10	4,265	0.1 (D)	369	1,419	0	200
N5 - Mountain Lands 5	2,028	0.2 (D)	361	1,388	0	200
N2 - Rural Residential 2	668	0.5 (D)	292	1,124	0	100
N1 - Rural Residential 1	454	1 (D)	305	1,173	0	21
<b>Residential</b>	<b>425</b>	<b>--</b>	<b>840</b>	<b>3,235</b>	<b>0</b>	<b>0</b>
U2 - Residential 2	252	1.6 (D)	360	1,386	0	0
U4 - Residential 4	148	3.2 (D)	344	1,323	0	0
U8 - Residential 8	26	6.4 (D)	137	526	0	0
<b>TWIN LAKES COMMUNITY PLAN</b>	<b>45</b>	<b>--</b>	<b>45</b>	<b>174</b>	<b>0</b>	<b>0</b>
<b>Rural</b>	<b>45</b>	<b>--</b>	<b>45</b>	<b>174</b>	<b>0</b>	<b>0</b>
RC - Rural Communities	45	1 (D)	45	174	0	0
<b>WALNUT PARK NEIGHBORHOOD PLAN</b>	<b>369</b>	<b>--</b>	<b>4,338</b>	<b>13,717</b>	<b>2,558</b>	<b>5,044</b>
<b>Commercial</b>	<b>41</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>2,135</b>	<b>4,358</b>
GC - General Commercial	35	1.3 (F)	0	0	1,963	3,786
OC - Office Commercial	7	0.6 (F)	0	0	173	572
<b>Industrial</b>	<b>8</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>180</b>	<b>112</b>
PU/I - Public Use / Institutional	8	0.5 (F)	0	0	180	112
<b>Mixed Use &amp; Specific Plan</b>	<b>11</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>242</b>	<b>474</b>
MC - Mixed Commercial	11	0.5 (F)	0	0	242	474
<b>Other</b>	<b>4</b>	<b>--</b>	<b>26</b>	<b>100</b>	<b>0</b>	<b>0</b>
R/P - Residential / Parking	4	7.2 (D)	26	100	0	0
<b>Residential</b>	<b>305</b>	<b>--</b>	<b>4,312</b>	<b>13,617</b>	<b>0</b>	<b>100</b>
NP I - Neighborhood Preservation I	167	7.2 (D)	1,200	4,619	0	100
NP II - Neighborhood Preservation II	21	14.4 (D)	298	1,146	0	0
NR - Neighborhood Revitalization	117	24 (D)	2,814	7,852	0	0
<b>WEST ATHENS - WESTMONT NEIGHBORHOOD PLAN</b>	<b>1,489</b>	<b>--</b>	<b>11,185</b>	<b>40,539</b>	<b>10,820</b>	<b>10,894</b>
<b>Commercial</b>	<b>155</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>6,047</b>	<b>8,456</b>
C.1 - Regional Commercial	45	1 (F)	0	0	1,940	1,060
C.2 - Community Commercial	81	1 (F)	0	0	3,513	6,994
C.3 - Neighborhood Commercial	2	0.5 (F)	0	0	41	79
C.4 - Commercial Manufacturing	15	0.64 (F)	0	0	416	318
CR - Commercial Recreation	13	0.25 (F)	0	0	137	5
<b>Public &amp; Open Space</b>	<b>278</b>	<b>--</b>	<b>0</b>	<b>0</b>	<b>4,773</b>	<b>1,813</b>

**Table 1  
Proposed General Plan**

<b>Land Use Designation</b>	<b>Acres<sup>3</sup></b>	<b>Density / Intensity<sup>4</sup></b>	<b>Units</b>	<b>Population<sup>5</sup></b>	<b>Bldg. Sq. Footage (in thousands)</b>	<b>Jobs<sup>5</sup></b>
OS.1 - Recreation / Open Space	122	--	0	0	0	70
PL.1 - Public/Quasi-Public Use	157	0.7 (F)	0	0	4,773	1,743
<b>Residential</b>	<b>1,057</b>	<b>--</b>	<b>11,185</b>	<b>40,539</b>	<b>0</b>	<b>625</b>
RD 2.3 - Single Family Residence	485	6.4 (D)	3,103	11,945	0	325
RD 3.1 - Two Family Residence	549	13.6 (D)	7,463	26,868	0	200
RD 3.2 - Medium Density Bonus	19	24 (D)	463	1,292	0	100
SCD - Senior Citizen Density Bonus	4	40 (D)	156	434	0	0
<b>Grand Total</b>	<b>1,653,056</b>	<b>--</b>	<b>668,911</b>	<b>2,383,373</b>	<b>729,510</b>	<b>477,862</b>

Notes:

1. Historically, jurisdiction-wide buildout levels do not achieve the maximum allowable density/intensity on every parcel and are, on average, lower than allowed by the General Plan. Accordingly, the buildout projections in this General Plan do not assume buildout at the maximum density or intensity and instead are adjusted downward to account for variations in buildout intensity.
2. The County has adopted a total of 13 community-based plans. The adoption date of these community-based plans vary and the boundaries of the community plans may or may not be coterminous with a specific plan.
3. Acres are given as adjusted gross acreages, which do not include the right-of-way for roadways, flood control facilities, or railroads.
4. The density/intensity figure shown reflects the projected density/intensity for buildout purposes, which is generally 80% of the maximum density/intensity permitted for that land use category. (D) denotes residential density and (F) denotes Floor Area Ratio.
5. Projections of population by residential designation are based on a persons-per-household factor that varies by housing type. Additionally, the projections of jobs by designation are based on an employment generation factor that varies by employment category, or actual number of jobs.
6. The figures for the unincorporated Santa Clarita Valley reference the figures in the Environmental Impact Report for the Santa Clarita Valley Area Plan Update. The methodology used to derive the figures for the unincorporated Santa Clarita Valley differs from the methodology used to generate the figures for other unincorporated areas and, therefore, they cannot be broken down by Land Use Category.
7. The Antelope Valley Area Plan represents the adopted plan, with the exception of the portion that overlaps with the Proposed General Plan community of 'Kagel / Lopez Canyons'. Therefore, the total acreage of the Antelope Valley represented here is less than the actual area of the adopted plan boundary.

The project will replace the adopted General Plan, including all of the elements (excluding the Housing Element), land use distribution maps, and circulation maps. Other components of the comprehensive General Plan Update include, but are not limited to:

- Update the Special Management Areas including but not limited to Agricultural Resource Areas, Seismic Hazard Zones, Flood Hazard Zones, Significant Ecological Areas, Hillside Management Areas, and Very High Fire Hazard Severity Zones.
- Update Significant Ecological Areas boundaries.
- Update of the Highway Plan.
- Amendments to the existing County ordinances and/or adoption of new County ordinances as necessary to implement the updated General Plan, including but not limited to the SEA CUP Ordinance, Hillside Management Ordinance, and the addition of new zones to implement portions of the land use legend.
- Rezoning as necessary to implement and/or maintain consistency with the updated General Plan.
- Rescinding or updating outdated policies, ordinances, manuals, codes and other guidance documents and enacting new implementing policies, ordinances, manuals, and other guidance documents as needed to reflect current law and the updated General Plan
- Digitizing, parcelizing, and refining land use policy maps for existing community-based plans, as needed.

### 3. PROBABLE ENVIRONMENTAL EFFECTS

#### Environmental Issues:

The County has determined that a Program EIR will be prepared for the proposed comprehensive General Plan Update. Section 15168 of the CEQA Guidelines states that a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. The Program EIR will be prepared in accordance with the requirements of CEQA Statutes and Guidelines, as amended. Pursuant to Section 15146 of the CEQA Guidelines the degree of specificity in the Program EIR will correspond to the degree of specificity involved in the comprehensive General Plan Update. The EIR will focus on the primary effects that can be expected to follow from adoption of the comprehensive General Plan Update and will not be as detailed as an EIR on the specific development or construction projects that may follow. Based on the County's preliminary analysis of the project, the following environmental issues will be examined in the Program EIR:

- |  |   |  |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics               | <input checked="" type="checkbox"/> Agricultural and Forest Resources | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources     | <input checked="" type="checkbox"/> Cultural Resources                | <input checked="" type="checkbox"/> Geology / Soils                    |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials     | <input checked="" type="checkbox"/> Hydrology / Water Quality          |
| <input checked="" type="checkbox"/> Land Use / Planning      | <input checked="" type="checkbox"/> Mineral Resources                 | <input checked="" type="checkbox"/> Noise                              |
| <input checked="" type="checkbox"/> Population / Housing     | <input checked="" type="checkbox"/> Public Services                   | <input checked="" type="checkbox"/> Recreation                         |
| <input checked="" type="checkbox"/> Transportation / Traffic | <input checked="" type="checkbox"/> Utilities / Service Systems       | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

The Draft EIR will address the short- and long-term effects of the Los Angeles County General Plan Update on the environment. Mitigation measures will be proposed for those impacts that are determined to be significant. A mitigation monitoring program will also be developed as required by Section 15150 of the CEQA Guidelines.

**REVIEW PERIOD:** This Revised NOP will be available for review from **June 26, 2013** to **July 26, 2013** on the Department of Regional Planning (Department) website at <http://planning.lacounty.gov/generalplan/ceqa>. Hardcopies will be available at the Department's main office and field office locations listed at the following link: <http://planning.lacounty.gov/locations>; all County libraries; Calabasas Library located at 200 Civic Center Way, Calabasas, CA 91302; and Altadena Library (Main Library) located at 600 East Mariposa Street, Altadena, CA 91001.

The Department is seeking input from both agencies and members of the public on the scope and content of the environmental information and analysis to be contained in the EIR. Any correspondence related to the General Plan Update received as part of the first NOP does not have to be resubmitted; it has already been incorporated as part of the environmental review process for the project. Due to the time limits mandated by State law, written comments must be sent via mail, e-mail, or fax no later than 5:00 PM on **Friday, July 26, 2013**. Please send your comments at the earliest possible date to:

Connie Chung, AICP  
Supervising Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012  
Email: [genplan@planning.lacounty.gov](mailto:genplan@planning.lacounty.gov)  
Fax: (213) 626-043

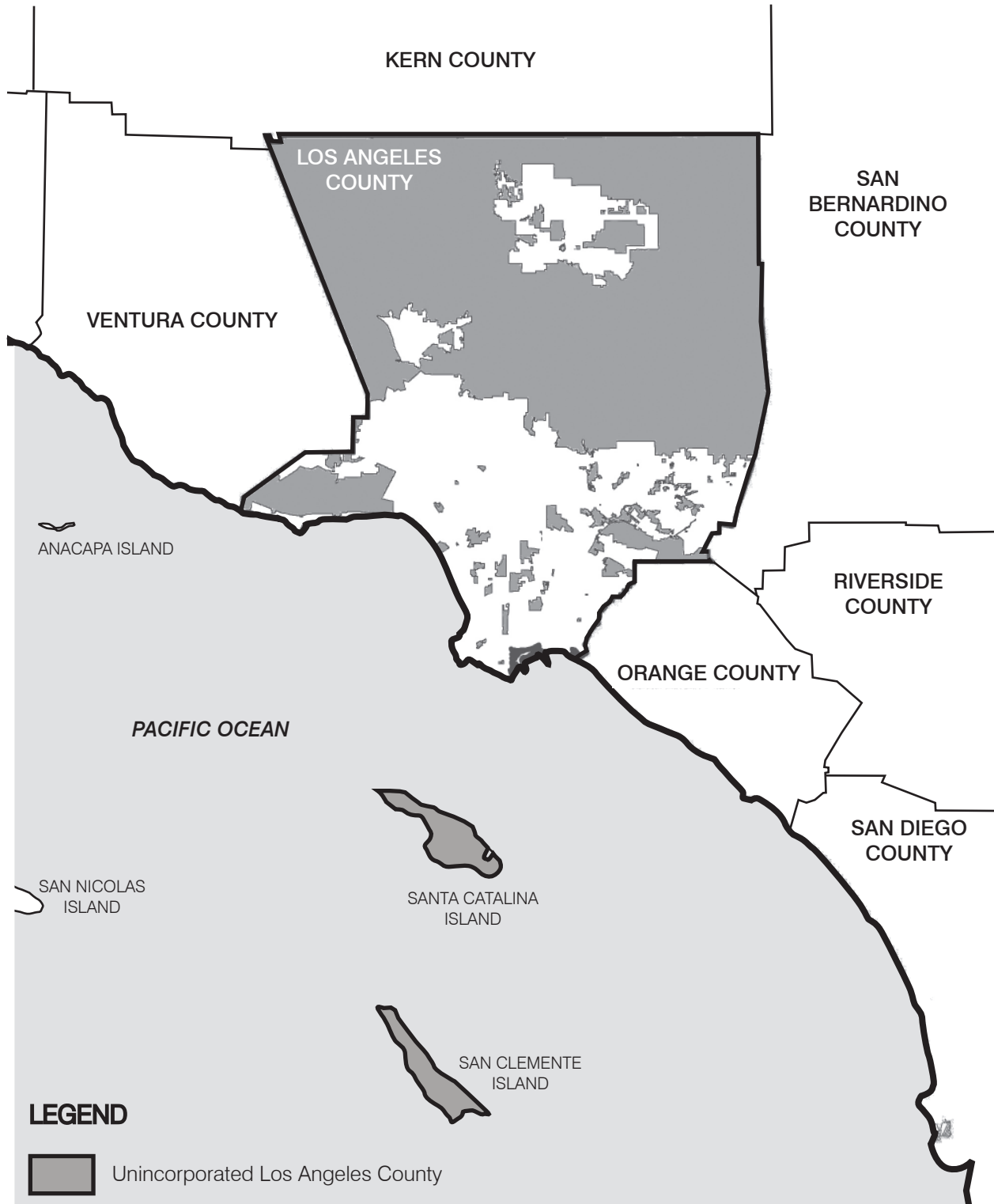
**PUBLIC SCOPING MEETING:** Pursuant to the California Public Resources Code Section 21803.9, Los Angeles County will conduct a public scoping meeting. This meeting will provide a public forum for information dissemination and dialogue regarding the components of the proposed project, the overall process, and the draft EIR. While staff will summarize the issues raised at these meetings, anyone wishing to make formal comments on the NOP must do so in writing. The public scoping meeting will be held at the time and location listed below:

**Date:** July 11, 2013  
**Time:** 5:00 p.m. to 6:00 p.m.  
**Location:** Los Angeles County  
Department of Regional Planning  
320 W. Temple Street, Room 150  
Los Angeles, CA 90012

The scoping meeting will also be streamed live at the following link:  
<http://streaming.planning.lacounty.gov/meeting>. Afterward, the recorded presentation and meeting will also be posted at the following link: <http://planning.lacounty.gov/generalplan/ceqa>.



# Regional Location



# county of ventura

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July 29, 2013

Connie Chung, Supervising Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 W. Temple St., Room 1356  
Los Angeles, CA 90012

E-mail: [genplan@planning.lacounty.gov](mailto:genplan@planning.lacounty.gov)

Subject: Comments on the Los Angeles County General Plan Update

Dear Ms. Chung:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,

  
Tricia Maier, Manager  
Planning Programs Section

Attachments

County RMA Reference Number 11-022-1





**PUBLIC WORKS AGENCY  
TRANSPORTATION DEPARTMENT  
Traffic, Advance Planning & Permits Division**

**MEMORANDUM**

**DATE:** July 2, 2013

**TO:** RMA – Planning Division  
Attention: Laura Hocking

**FROM:** Transportation Department *LH*

**SUBJECT: REVIEW OF DOCUMENT 11-022-1** Revised Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the **Los Angeles County General Plan**  
Lead Agency: **Los Angeles County**

Pursuant to your request, the Public Works Agency – Transportation Department has reviewed the Revised Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Los Angeles County General Plan.

The project is a comprehensive update of the Los Angeles County General Plan. The NOP is being recirculated because the County of Los Angeles Department of Regional Planning is no longer including the Antelope Valley Area Plan Update in the Los Angeles County General Plan Update. The project includes goals, policies, and implementing programs and ordinances. The project covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region. The General Plan Update focuses on growth in the unincorporated areas, with access to services and infrastructure, and reduces the potential for growth in the County's environmentally sensitive and hazardous areas.

The Transportation Department provided comments dated August 22, 2011 and January 3, 2011. We provide the following comment:

When future developments are proposed, the projects may have site-specific and/or cumulative adverse traffic impacts on County of Ventura roadways. The subsequent environmental documents under the Los Angeles County General Plan or any Area Plan Update should include any site-specific or cumulative impacts to the County of Ventura local roads and the County of Ventura Regional Road Network.

Our review is limited to the impacts this project may have on the County of Ventura Regional Road Network.



**VENTURA COUNTY WATERSHED PROTECTION DISTRICT**  
PLANNING AND REGULATORY DIVISION  
800 South Victoria Avenue, Ventura, California 93009  
Tom Wolfington, Permit Manager – (805) 654-2061

**M E M O R A N D U M**

DATE: July 3, 2013

TO: Laura Hocking, RMA/Planning Technician

FROM: Tom Wolfington, P.E., Permit Manager *JW*

SUBJECT: RMA 11-022-1 – REVISED Notice of Preparation of Draft EIR and  
Notice of Public Scoping Meeting  
Los Angeles County General Plan Update

Pursuant to your request, this office has reviewed the subject Notice of Preparation.

**PROJECT LOCATION**

Los Angeles County is geographically one of the largest counties in the country with approximately 4,083 square miles. The County stretches along 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange County and San Bernardino County, to the north by Kern County, and to the west by Ventura County. The County also includes two offshore islands, Santa Catalina Island and San Clemente Island. The unincorporated areas account for approximately 65 percent of the total land area of the County. The unincorporated areas in the northern portion of the County are covered by large amounts of sparsely populated land and include the Angeles National Forest, part of the Los Padres National Forest, and the Mojave Desert. The unincorporated areas in the southern portion of the County consist of 58 noncontiguous land areas, which are often referred to as the County's unincorporated urban islands.

**PROJECT DESCRIPTION**

The proposed project is a comprehensive update of the Los Angeles County General Plan. The County initially released the Notice of Preparation (NOP) for an Environmental Impact Report (EIR) with a 30 day public review period from August 15, 2011 to September 14, 2011. The project description included an update to the General Plan (excluding the Housing Element) and an update to the Antelope Valley Area Plan. The project description has since been changed to exclude the Antelope Valley Area Plan Update.

The project includes goals, policies, implementing programs, and ordinances. The project covers the unincorporated area of Los Angeles County and accommodates new housing and employment opportunities in anticipation of

July 3, 2013

RMA 11-022-1 – REVISED Notice of Preparation of Draft EIR

Los Angeles County General Plan Update

Page 2 of 2

population growth in Los Angeles County and the region. The General Plan Update focuses growth in the unincorporated areas of LA County with access to services and infrastructure and reduces the potential for growth in the County's environmentally sensitive and hazardous areas. The project will replace the adopted General Plan.

**WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:**

The Ventura County Watershed Protection District (District) supports the examination of the environmental issues checked in the NOP of the DEIR, including the addressing of long-term effects.

The District is particularly interested in the evaluation of all potential effects on Ventura County.

In previous reviews related to such planning activities as One Valley One Vision, the Santa Clarita Valley Area Plan Update, and Mission Village – Newhall Ranch, the District has expressed concerns related to discussion of regional solutions to eliminate increases in stream runoff at the Ventura / Los Angeles County line; the effects of fires and erosion; the hydrological and hydraulic impacts of flood peaks, flood stages, flood velocities, and erosion and sedimentation at all flood frequencies; the basis for use of bulking factors in connection with development changes; the use of latest available hydrology data; and the impact of further development on fluvial mechanics.

**END OF TEXT**

## Connie Chung

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**From:** Harris, Scott P. @Wildlife [Scott.Harris2@wildlife.ca.gov]  
**Sent:** Friday, July 12, 2013 3:31 PM  
**To:** DRP General Plan  
**Subject:** RE: LA County General Plan Update - Considerations for Smaller Projects Exempt from CEQA Review

So who knows when the parcels around Lobo Canyon Road (where the referenced below project is near Agoura Hills) got created. On Google Earth, the general area is getting chopped up and scraped as far back as 1989. The property CDFW visited to the east, had 5 parcels on Oct 17, 2000, now has four houses on four of the five parcels. If a house shows up for parcel # 5, then that will be it for pentachaeta 1200 feet east. I guess it's just another example of the more challenging aspects of what we do. Once a bunch of random parcels get created without adequate surveys and considerations, it can be decades later that impacts occur.

Scott P. Harris  
Environmental Scientist  
California Department of Fish and Wildlife  
(626) 797-3170  
[Scott.p.harris@wildlife.ca.gov](mailto:Scott.p.harris@wildlife.ca.gov)

---

**From:** DRP General Plan [mailto:Dd09f2@planning.lacounty.gov]  
**Sent:** Thursday, July 11, 2013 11:49 AM  
**To:** Harris, Scott P. @Wildlife  
**Cc:** DRP General Plan  
**Subject:** RE: LA County General Plan Update - Considerations for Smaller Projects Exempt from CEQA Review

Thank you!

---

**From:** Harris, Scott [P. @Wildlife](mailto:Scott.Harris2@wildlife.ca.gov) [mailto:Scott.Harris2@wildlife.ca.gov]  
**Sent:** Thursday, July 11, 2013 10:17 AM  
**To:** DRP General Plan  
**Subject:** LA County General Plan Update - Considerations for Smaller Projects Exempt from CEQA Review

Greetings,

During the LA County General Plan updating process over the past several years, the CA Dept. of Fish and Wildlife has provided the County with input regarding the problems with exempting smaller projects from CEQA. Case in point; there is a project that CDFW became aware of a few days ago (Project #R2013-00531) that Steve Mar in the Planning Dept. is lead on and has been very helpful with. This is a good example why smaller SFH projects should sometimes be held to a higher standard and be subject to CEQA. This project was exempt from CEQA because, as Mr. Mar informed the Department, the original 2010 grading permit was for 2,864 cu. yd. of grading – below the 5,000 cu. yd. threshold for a CUP, therefore there was no CEQA review done. However this project may have resulted in unauthorized take of a state and federal endangered plant species which may have been prevented if it were subject to an Initial Study. The project exceeded the grading limit of its original grading permit and only then the listed plant was discovered because the project now needs a CUP and an IS was performed. Please keep these types of projects in mind when revisiting SFH/Grading exemptions from CEQA review in the County. Thank you.

Scott P. Harris  
Environmental Scientist  
California Department of Fish and Wildlife  
(626) 797-3170  
[Scott.p.harris@wildlife.ca.gov](mailto:Scott.p.harris@wildlife.ca.gov)

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7, REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

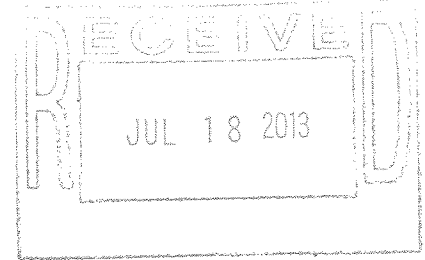
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PHONE: (213) 897-9140

FAX: (213) 897-1337

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July 16, 2013



Ms. Connie Chung  
Los Angeles County  
320 W. Temple St., Room 1356  
Los Angeles, CA 90012

IGR/CEQA No. 130635AL-Revised NOP  
Ref. IGR/CEQA No. 120521AL-Draft GP  
Referenced to IGR/CEQA No. 110830-NOP  
Los Angeles County General Plan Update 2035  
Vic. LA-County Wide  
SCH # 2011081042

Dear Ms. Chung:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is a revised Notice of Preparation for the comprehensive update of the Los Angeles County General Plan. The project includes goals, policies, implementing programs and ordinances. It covers the unincorporated areas of Los Angeles County and accommodates new housing and employment opportunities in anticipation of population growth in the County and the region.

As discussed in your telephone conversation on July 10, 2013 with Mr. Alan Lin, Caltrans Project Coordinator, the traffic consultant is in the process of preparing the transportation section of the General Plan including the traffic impact study (TIS). The County has requested a meeting with Caltrans upon the availability of the draft TIS.

Caltrans is requesting that the TIS include a discussion of potential regional cumulative traffic impacts to the State facilities and possible mitigation measures. The goal is to mitigate any traffic impacts within the County boundaries on the State facilities for all future projects.

As a reminder, it is suggested that the County include the following policies in Chapter 4: Mobility Element:

1. County will coordinate with Caltrans on circulation and land use decisions that may affect State facilities within County limits and to support programs to increase capacity and improve operations on the highways.



facilities in identifying potential traffic impact locations and traffic mitigation measures.

3. For State thresholds and guidance on the preparation of acceptable traffic studies, please refer to the Statewide Guide for the preparation of Traffic Impact Studies at:

[http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

When analyzing the State Highway System, Caltrans uses the Level of Service (LOS), which is based on measures of effectiveness (MOEs), a performance level threshold. Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" on the State Highway System, with the understanding that many freeways are already operating at LOS "F" and any additional trips added to the facility are considered a significant impact by Caltrans standards.

The California Department of Transportation (Caltrans) as a commenting/responsible agency under CEQA has jurisdiction superceding that of MTA in identifying the freeway analysis necessary for a development. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the CMP guide of 150/50 or more vehicle trips added before freeway/highway analysis is needed. MTA's Congestion Management Program in acknowledging Caltrans' role stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System.

Please be reminded that although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the Los Angeles County's CMP criteria alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. CMP requirements were developed by Los Angeles County in the context of CMP goals and objectives; it does not supersede the criteria from the commenting/responsible agency under CEQA. Caltrans' Guide directs preparers of traffic impact analysis to consult with the local District as early as possible to determine the appropriate requirements and criteria of significance to be used in the traffic impact analysis. Generally, when traffic is added to already deficient highway conditions (LOS "F"), it is considered a cumulatively significant impact, as it may contribute to the extension of the congestion period.

Again, we would like to encourage the County to incorporate the above items to your policies in the proposed Mobility Element. If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 130635AL.

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

26 July 2013

VIA ELECTRONIC AND U.S. MAIL

County of Los Angeles  
Department of Regional Planning  
ATTN: Connie Chung, AICP, Supervising Regional Planner  
320 W. Temple St., Rm. 1356  
Los Angeles, CA 90012

**SUBJECT Comments in Response to the Revised Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting for Los Angeles County General Plan 2035**

Dear Ms. Chung:

The City of Rancho Palos Verdes appreciates the opportunity to comment upon the revised Notice of Preparation (NOP) for the above-mentioned project. The City respectfully requests the inclusion of the following issues within the scope of the potential environmental impacts analyzed in conjunction with the proposed general plan update and amendment:

- 1) Many areas of the Palos Verdes Peninsula—which includes the Westfield Urban County Island (UCI)—are characterized by areas containing major landslides and/or exhibiting high slope instability. The discussion of geotechnical hazards in the Draft Environmental Impact Report (DEIR) should carefully consider these potential impacts as they apply in the Westfield UCI.
- 2) The Palos Verdes Peninsula is perhaps most accurately characterized as a semi-rural area, where traffic is the most common source of “nuisance” noise. The project description in the Initial Study indicates the Mobility Element will be amended. On the Palos Verdes Peninsula, a 1.25-mile segment of Crenshaw Boulevard traverses the Westfield UCI (between Palos Verdes Drive North and Silver Spur Road), while the entire length of Hawthorne Boulevard from Pacific Coast Highway to Palos Verdes Drive West is a designated County highway (Route N7). If any changes are proposed to the classification, configuration or alignment of either of these thoroughfares as a part of the proposed General Plan update, the associated noise impacts upon adjacent land uses should also be fully analyzed in the DEIR for this project.

**Connie Chung**

**26 July 2013**

**Page 2**

- 3) A significant portion of the Westfield UCI currently utilizes private sewage disposal systems. Such systems have potential negative impacts upon groundwater quality, as well as upon landslides and slope instability (see Comment 1 above). Therefore, we suggest that the discussion of water quality resource impacts in the DEIR should address the expansion of private sewage disposal systems.
- 4) Biological surveys conducted in association with the City's Natural Communities Conservation Plan (NCCP) program identified coastal sage scrub habitat on the side slopes within Agua Negra Canyon, which extends from Palos Verdes Drive North to Silver Spur Road and is bisected by Crenshaw Boulevard (see Comment 2 above). As such, the City believes that biological resource impacts will almost certainly occur within the Westfield UCI, and should be carefully considered in the DEIR for this project.
- 5) Please note that the intersection of Western Avenue and Toscanini Drive in the City of Rancho Palos Verdes is one of the intersections that are monitored for compliance with the County's Congestion Management Plan (CMP). As such, the City requests that the traffic impact analysis in the DEIR for the proposed project include the intersection of Western Avenue and Toscanini Drive.
- 6) Residents in the Westfield UCI are served by the Palos Verdes Peninsula Unified School District (PVPUSD), which, in the past decade, has re-opened several closed campuses in the face of increased demand from the community. Any proposed amendments to the General Plan that directly or indirectly induce additional population growth in the Westfield UCI have the potential to exacerbate this condition. The City suggests that the County should consult with all affected school districts serving the unincorporated areas of the County—not just the Los Angeles Unified School District (LAUSD)—in its assessment of the potential environmental effects of the proposed project.
- 7) We understand that changes in land use designation may be proposed to reflect existing land use patterns that are not depicted on the current Land Use Policy Map. This may have the effect of "legalizing" existing nonconforming land uses, thereby providing greater opportunities for the expansion of these uses in the future. Within the Westfield UCI, there is an existing office building at the southeast corner of Crenshaw Boulevard and Palos Verdes Drive North that is designated "Residential 1—Low Density" on the current Land Use Policy Map. There may also be portions of residential neighborhoods in the Westfield UCI (also designated "Residential 1—Low Density") that were built out at higher densities prior to the adoption of the current County General Plan. The DEIR for

**Connie Chung**  
**26 July 2013**  
**Page 3**

this project should analyze the potential growth-inducing effects that land use changes involving existing nonconforming uses could generate.

Again, thank you for the opportunity to provide comments on this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at [kittf@rpv.com](mailto:kittf@rpv.com).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kit Fox', is positioned above the typed name.

**Kit Fox, AICP**  
Senior Administrative Analyst

cc: Mayor Susan Brooks and City Council  
Carolyn Lehr, City Manager  
Carolynn Petru, Deputy City Manager



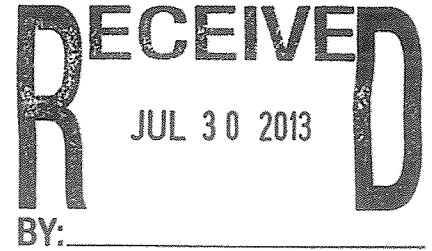
# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

July 25, 2013



Connie Chung, Supervising Regional Planner  
General Plan Section  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

Dear Ms. Chung:

**REVISED NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND  
NOTICE OF PUBLIC SCOPING MEETING, "LOS ANGELES COUNTY GENERAL PLAN UPDATE"  
THE PROJECT INCLUDES GOALS, POLICIES, IMPLEMENTATION PROGRAMS AND  
ORDINANCES, LOS ANGELES COUNTY (FFER #201300100)**

The Revised Notice of Preparation of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

**PLANNING DIVISION:**

1. We have no comments at this time.

**LAND DEVELOPMENT UNIT:**

1. Any future development must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
2. The Fire Prevention Division, Land Development Unit, has no additional comments regarding the proposed revised Notice of Preparation at this time. Additional and specific comments will follow during the Draft EIR review process and/or the submittal of plans.
3. Should any questions arise, please contact Wally Collins of the County of Los Angeles Fire Department, Land Development Unit, at (323) 890-4243 or [Wally.Collins@fire.lacounty.gov](mailto:Wally.Collins@fire.lacounty.gov).

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOORA HILLS  
ARTESIA  
AZUSA  
BALDWIN PARK  
BELL  
BELL GARDENS  
BELLFLOWER  
BRADBURY

CALABASAS  
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CERRITOS  
CLAREMONT  
COMMERCE  
COVINA  
CUDAHAY

DIAMOND BAR  
DUARTE  
EL MONTE  
GARDENA  
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LA PUENTE  
LAKEWOOD  
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LAWNDALE  
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MAYWOOD  
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PARAMOUNT  
PICO RIVERA

POMONA  
RANCHO PALOS VERDES  
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TEMPLE CITY  
WALNUT  
WEST HOLLYWOOD  
WESTLAKE VILLAGE  
WHITTIER

Connie Chung, Supervising Regional Planner  
July 25, 2013  
Page 2

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the final Environmental Document.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. The Health Hazardous Materials Division has no objection to the proposed project.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

FV:ij



Los Angeles  
World Airports

July 11, 2013

Connie Chung, AICP  
Supervising Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012

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Ann M. Hollister  
Raúl Pérez  
Fernando M. Torres-Gil

Gina Marie Lindsey  
Executive Director

Dear Ms. Chung,

Los Angeles World Airports (LAWA) is pleased to offer these initial comments regarding the proposed General Plan Update and Antelope Valley Plan Area Update. LAWA is a proprietary department of the City of Los Angeles, which operates, maintains and develops airports including LAX, LA/Ontario International (LA/ONT), Van Nuys Airport (VNY), and has future plans to develop Palmdale (PMD) Airport.

The proposed update to the General Plan may have a serious impact on LAWA's ability to develop an airport at Palmdale as well as our ability to use and maintain the property during the interim. We are encouraged and thankful for staff's willingness to meet with us and listen to our feedback on the proposed plan.

It is our hope that your plan update will reflect a unified zoning scheme for Palmdale Airport that allows for future airport development as well as economically beneficial interim uses.

Thank you,

Christopher Koontz  
Chief of Airport Planning I

CK:es

Cc: Supervisor Michael D. Antonovich



NCL 13-027

July 25, 2013

Ms. Connie Chung, AICP, Supervising Regional Planner  
Los Angeles County, Department of Regional Planning  
320 W. Temple Street, Room 1356  
Los Angeles, California 90012

SUBJECT: Revised Notice of Preparation of a Draft Environment Impact Report for the Los Angeles County General Plan Update

Dear Ms. Allen:

The County of Orange has reviewed the Revised Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County General Plan Update and has no comments at this time. We would like to be advised of any further developments, therefore, please keep us on the distribution list for future notifications related to this Update.

Sincerely,



*Polin* Polin Modanlou, Manager  
Strategic Land Planning  
OC Public Works/OC Planning  
300 North Flower Street  
Santa Ana, California 92702-4048  
[Polin.modanlou@ocpw.ocgov.com](mailto:Polin.modanlou@ocpw.ocgov.com)

PM/yj

**RECEIVED**  
JUL 29 2013  
BY: \_\_\_\_\_





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Los Angeles County Department of Regional Planning  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012

Nancy Helsley  
Director

R.C. Brody  
Director

Via email to: [genplan@planning.lacounty.gov](mailto:genplan@planning.lacounty.gov)

EXECUTIVE OFFICER  
Clark Stevens, AIA

**RE: Comments on the NOP for the Los Angeles County General Plan Update**

Dear Ms. Chung,

On behalf of the Resource Conservation District of the Santa Monica Mountains (RCDSMM), thank you for the opportunity to submit comments on the NOP for the Los Angeles County General Plan Update. Building upon the comments we submitted in 2011, we would also like the following to be addressed in the EIR for the Plan Update:

Chapter 1 Introduction

This section would benefit from a clearly articulated General Plan Vision.

We appreciate that Sustainability is the underlying unifying principle for the General Plan, however this document provides an opportunity for the County to articulate a vision for the future that explains how all of the various plan elements can interact to achieve an identifiable vision of how LA County will function in 50 years. Clearly articulating this vision would greatly enhance the functionality of the General Plan.

For instance the guiding vision could explain how lessons learned from the implementation of the 1986 Plan has shaped future planning, as well as ways that ecosystem services cost-benefits analysis could be integrated into all aspects of planning. Formal recognition, examination and integration of ecosystem services needs to be a clearly identified fundamental part of the planning process at all levels in order to be successful.

Promoting appropriate ecosystem form is as important to sustainability as its measurement. We look for the new General Plan to emphasize watershed functionality, and to seek methods and policies that will naturalize the hydrologic regime over time as areas are redeveloped so that downstream areas are not carrying undue burdens, and so that ultimately our urban creeks and our river can transition from flood-control facilities to multi-use areas with value-adding recreational and ecological functions. Re-using, slowing, spreading and sinking our water

wherever possible- in order to move the County toward the pre-development flow regimes and functionality of the watershed- should be a primary goal of the General Plan.

The plan could also recognize and integrate long term processes into the evaluation of potential impacts to allow for ecological resiliency, which in turn results in greater sustainability. This would require a formal effort to engage in on-going dialog and implementation of up to date information from partner agencies, local scientists, and the public that can be integrated into adaptive management of the planning process.

The uncertainty faced by the County regarding effects of water and energy availability, as well as climate changes between now and 2035 are difficult to project, but we can anticipate that they could potentially reset the underlying paradigms that currently shape our planning. Explicitly recognizing this uncertainty and developing a programmatic way to respond will enable the County to better achieve the goals and policies identified in the General Plan.

### Chapter 3. Land Use Element:

We recommend adding to the descriptive narrative introduction the role that careful stewardship of environmental services provides in terms of long-term benefits.

It should be recognized that some areas are too hazardous, and/or environmentally sensitive for development. The County should reconfigure zoning to reflect those issues and direct development into better locations, ideally through the implementation of a formal Transfer of Development Rights program with appropriately identified “donor” and “recipient” areas.

How can preservation of agricultural opportunities be integrated with wise management and conservation of chaparral and other native ecosystems?

Land use compatibility narrative should also consider impacts to open space from fuel modification, type conversion from native habitats to agriculture, etc.

How can infrastructure services (energy, water, sewer, trash, etc.) be localized to reduce transportation costs and provide local, sustainable services that would avoid impact problems associated with establishing centralized infrastructures distant from the point of service, as with imported water or with remote solar farms converting native habitat to hardscape?

Sustainable Subdivision Design should also recommend preventing habitat fragmentation, retention of storm water, localized production of appropriate energy, water conservation and reuse. This is particularly important when considering “density controlled design”- policy and implementation practices should ensure that not only is development concentrated, but that it is located to minimize resource impacts. Restoration or enhancement of degraded natural systems should be considered a critical part of sustainable subdivision design, and incentives created so that the land is not merely protected from unnecessary impacts but is arguably improved in ecosystem value and functionality.

How will the county promote an integrated environmental site analysis into the first steps of the planning process to ensure that ecosystem elements are identified and considered so that preliminary designs brought for evaluation by the Initial Study are clearly aligned with the goals and policies of the General Plan? Requirements to engage resource conservation agencies and professionals from the outset are needed in order to protect landowners from expending significant resources on unsustainable solutions, and to streamline the planning approval process by identifying criteria and specific resource requirements earlier in the process.

While TOD and other infill strategies are appropriate, such density “bonuses” should be clearly tied to infrastructural and environmental performance standards so that TOD is more than just adding development rights nearer to mass transit. Such public investment in private development opportunity also provide for an enhancement of urban water management so that flow regimes are captured, reused, slowed and infiltrated as these densities are created, rather than increasing- or even maintaining- the current burdens to infrastructure and natural systems.

Will Public Works and Utilities be required to adhere to all the environmental constraints required of private parties? If not, why not?

#### Chapter 5: Air Quality Element

Responding to climate change section (pg 111) needs to explicitly recognize the important contribution of native vegetation and protection of functional ecosystems as an important way of mitigating climate change impacts. Preserving existing woodlands and scrublands can be more cost effective than planting new, and the only certain way to prevent functional habitat loss. The plan should identify degraded habitat areas where targeted restoration could also serve as carbon sequestration mitigation bank.

We suggest adding a policy to AQ2 that specifically addresses the need to preserve existing natural habitats and vegetation as a way of reducing and mitigating for air pollution. Natural plant communities, especially our woodlands and forests contribute significant ecosystem service benefits that are extremely costly to replicate once they are gone.

Policy AQ 4.2 – We suggest that this be reworded such that development designs retain existing, as well as provide substantial tree cover.

#### Chapter 6: Conservation and Natural Resources Element

On page 121, it states that there is no coordinated master plan to acquire, manage and preserve open space in the County. How are private open space easements tracked and monitored?

We agree that a coordinated open space master plan is needed.

Since open space can include anything from golf courses to wild lands, what are the guidelines for designating specific requirements for open space preservation and integration into the fabric of wild lands?

It is important to identify and call out dark sky role as important resource, as consistent with the current County Dark Sky Ordinance. Regulation of night lighting and providing places where

residents can see the stars is a key element of open space preservation.

We recommend adding a policy to Goal C/NR 2: Effective collaboration in open space resource preservation to address the on-going conflicts related to development adjacent to existing public open space. Maintaining adequate buffers between private and public lands for fuel modification and other practices is critical.

Biological Resources:

What are the criteria or methods used to update the Significant Ecological Areas? Will the County provide SEA areas as a parcel-level layer in the GIS maps online? This would facilitate evaluating impacts of individual projects on these areas.

The text box on page 130 should reflect adoption of Part 1 of the Oak Woodlands Conservation Management Plan in August 2011 and the pending release of the Guidelines documents. The RCD is appreciative of the inclusion of this in the General Plan Update.

We suggest adding a goal to the Conservation Element identifying a measurable distance of setback between new development and riparian zones.

Marine Protected Areas information should be added to the section following discussion on Areas of Special Biological Significance on page 112.

Responding to climate change section needs to explicitly recognize the important contribution of native vegetation and protection of functional ecosystems as an important way of mitigating climate change impacts. Preserving existing woodlands and scrublands is more cost effective in many cases than planting new ones!

The plan should identify degraded habitat areas where targeted restoration could also serve as a carbon sequestration mitigation bank.

The Plan Update should identify the relationship between fuel modification requirements and type conversion of native habitats, and provide policy guidance to reduce these impacts, especially adjacent to public open spaces.

Water Quality/Resources:

The Plan should identify ways that each landowner can implement water conservation through rainwater harvesting, infiltration, reuse, etc. The need for these conservation and stormwater measures should be increased as potential density increases, as in TOD districts. Such areas should enhance the public's infrastructural and natural systems as well as its population-holding capacity and mass-transit use.

Given the requirements of TMDLs and other regulatory standards, we need to make clear connection between sources of bacteria and pathogenicity.

Policies related to water quality should emphasize distributed, project-based approaches

over centralized, conventional, end-of-pipe approaches

#### Agriculture

Vineyards are not identified as a commodity in Table 6.6 (pg 142) and should be added.

As part of Goal C/NR 9 Sustainable agricultural practices, a policy is needed that examines agricultural resource areas and correlate these with remaining native vegetation communities to identify and track impacts and reduce loss and conversion of native vegetation to agricultural uses.

#### Mineral and Energy Resources

We support Policy C/NR 11.4: Require that mineral resource extraction and production operations be conducted to protect other natural resources and prevent excessive impact in hillside areas.

We recommend that policy C/NR 12.1 also prioritize using local sources of energy co-located with existing infrastructure to reduce environmental impacts. For example, installing solar panels on existing roofs and parking lots could provide local power, and if implemented properly could also reduce temperatures in massive parking lots, which in turn reduces evapotranspiration of gas in cars as well as improves shade tree potential growth. As with water quality management, distributed approaches are preferable to centralized.

We also recommend adding a policy that specifically addresses hydraulic fracturing and its associated environmental impacts.

#### Scenic Resources

In addition to the official state highways listed in Table 6.8, other highways throughout the County provide significant vistas. A policy advocating additional potential scenic highway designations to protect other important transportation corridor vistas should be considered.

We appreciate the policies outlined to support Goal C/NR 13 to protect visual and scenic resources.

#### Historical, Cultural and Archeological Resources

The plan should recognize the interrelationship between the landscape configuration and these anthropogenic resources. Often a historic or cultural site would not be so without the surrounding environmental conditions.

#### Chapter 7: Parks and Recreation Element

We support the effort to identify small, county owned areas in more densely populated areas that could be restored as parks, local community gardens and open space for local residents.

#### Chapter 9: Safety Element

The plan should set the stage for zoning in areas with identified geologic, seismic, flood, fire or other natural hazards should be reassigned to open space or lowest possible density use to

reduce costs associated with extending development into harms way.

For instance, the language in Policy S.1.2 only requires that geotechnical studies be completed, but does not provide guidance on what level of risk would be acceptable.

We appreciate the goals and policies outlined for Flood and Fire Hazards.

#### Chapter 10: Public Services and Facilities Element

We agree that there is a need to effectively track development, and recommend that a review of the policies versus built reality of the 1986 plan be evaluated to identify ways to avoid making the same mistakes, provide insight into what worked or did not work, and set the stage for careful monitoring and development of benchmark metrics to provide annual evaluation of proposed goals and policies.

We suggest adding a policy to Goal PS/F 1 that clearly requires evaluation of existing ecosystem service functions as part of the evaluation of public facilities.

#### Water:

With only 33% of water supply local, conservation and landscape restrictions are critical! Stronger policies restricting use of lawns and other high water use landscaping in both public and private areas is recommended, as are policies that incentivize rainwater capture and stormwater filtration and reuse.

#### Wastewater and sewer

The plan should recognize the role of onsite septic systems to assist in the reduction of end of pipe pollution and utilize local rather than regional based systems. Establishing a maintenance and monitoring program that can be fairly and equitably be implemented is critical.

#### Utilities

Siting should be localized and decentralized whenever possible to a) reduce impacts, 2) reduce transmission losses, 3) promote local conservation by connecting users to their systems more directly, 4) reduce system wide malfunctions.

Utility companies should comply with all best management practices and environmental protection standards imposed on private developers.

#### Chapter 11: Economic Development Element

Given the need for promoting jobs locally, provide an integrated plan that connects jobs more directly to transportation and housing by clustering makes sense.

The Plan should formally recognize that economic growth in LA County is directly tied to our environment - extensive portions of the local economy are tourist driven and reliant upon a functional ecosystem from the beaches to the mountains.

The policies should avoid fostering short-term growth at the expense of long-term ecological sustainability and economic value.

### Part III: General Plan Implementation

The requirement for Annual Progress Reports for each of the major Policy elements is a good way to develop an on-going review of policy implementation and effectiveness.

What metrics will be used to evaluate the effectiveness of these policies?

The Resource Conservation District of the Santa Monica Mountains looks forward to a new General Plan that will bring Los Angeles County policies in line with emerging paradigms that emphasize ecological services and performance, and provide true incentives to support private land-use decisions and approaches to “green” our communities. This next Plan provides a critical opportunity to *enhance and expand* both our natural resources and our quality of life. We appreciate the opportunity to provide input and look forward to reviewing the resulting Environmental Impact Report.

Respectfully submitted,



Clark Stevens, Architect  
Executive Officer

SOUTHERN CALIFORNIA



**ASSOCIATION OF  
GOVERNMENTS**

**Main Office**

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Transportation  
Keith Millhouse, Ventura County  
Transportation Commission

July 24, 2013

Ms. Connie Chung, AICP  
Supervising Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012  
[genplan@planning.lacounty.gov](mailto:genplan@planning.lacounty.gov)

**RE: SCAG Comments on the Revised Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County General Plan Update [I20130151]**

Dear Ms. Chung:


Thank you for submitting the Revised Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County General Plan to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Revised Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County General Plan Update. The proposed project is a comprehensive update of the Los Angeles County General Plan including goals, policies, implementation programs and ordinances covering unincorporated Los Angeles County. As set forth in the attached, SCAG recommends that the Draft EIR include a review and consideration of the adopted RTP/SCS goals and that the analyses reflect the most recently adopted growth forecasts.

**When available, please send environmental documentation to SCAG's office in Los Angeles or by email to [leep@scag.ca.gov](mailto:leep@scag.ca.gov) providing, at a minimum, the full comment period for review.** If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895 or [leep@scag.ca.gov](mailto:leep@scag.ca.gov). Thank you.

Sincerely,

  
Jonathan Nadler  
Manager, Compliance and Performance Assessment

<sup>1</sup> SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.



**COMMENTS ON THE REVISED NOTICE OF PREPARATION OF AN  
ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES COUNTY  
GENERAL PLAN UPDATE [SCAG NO. I20130151]**

**CONSISTENCY WITH RTP/SCS**

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

**RTP/SCS Goals**

The 2012-20135 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012-2035 RTP/SCS are the following:

<b>SCAG 2012-2035 RTP/SCS GOALS</b>	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012-2035 RTP/SCS Goals	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness.</i>	<i>Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region.</i>	<i>Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference</i>
RTP/SCS G3: <i>Ensure travel safety and reliability for all people and goods in the region.</i>	<i>Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference</i>
etc.	etc.

**Regional Growth Forecasts**

The Draft EIR for the Los Angeles County General Plan Update should reflect the most recently adopted SCAG forecasts (see <http://scag.ca.gov/forecast/index.htm>), which are the 2012-2035 RTP/SCS population, household and employment forecasts. The forecasts for the region and applicable jurisdictions are below.

Forecast	Adopted SCAG Region Wide Forecasts		Adopted Unincorporated Los Angeles County Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	1,159,100	1,399,500
Households	6,458,000	7,325,000	336,100	405,500
Employment	8,414,000	9,441,000	266,100	318,100

**MITIGATION**

SCAG staff recommends that you review the SCAG 2012-2035 RTP/SCS Final Program EIR List of Mitigation Measures Appendix for additional guidance, as appropriate. The SCAG List of Mitigation Measures may be found here: [http://scag.ca.gov/igr/pdf/SCAG\\_IGRMMRP\\_2012.pdf](http://scag.ca.gov/igr/pdf/SCAG_IGRMMRP_2012.pdf)

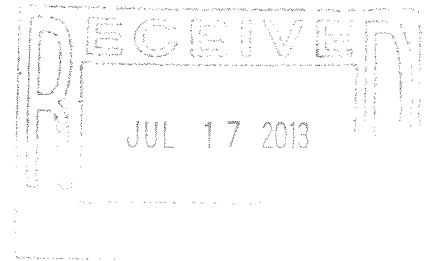


# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

July 12, 2013



Connie Chung, AICP  
Supervising Regional Planner  
Los Angeles County, Department of Regional Planning  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012

## **Notice of Preparation of a CEQA Document for the Revised Los Angeles County General Plan Update Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

### **Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as the recently released CalEEMod. This model is available on the SCAQMD Website at: <http://www.aqmd.gov/ceqa/models.html>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM<sub>2.5</sub> emissions from construction and operational activities and processes. In connection with developing PM<sub>2.5</sub> calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM<sub>2.5</sub> emissions and compare the results to the recommended PM<sub>2.5</sub> significance thresholds. Guidance for calculating PM<sub>2.5</sub> emissions and PM<sub>2.5</sub> significance thresholds can be found at the following internet address: [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html).

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html). An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

### Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

### Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,



Ian MacMillan

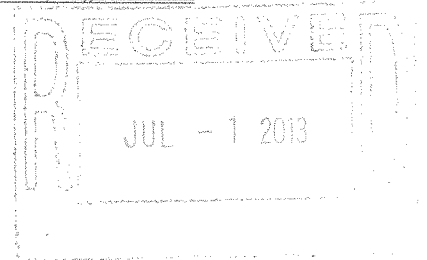
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM  
LAC130625-05  
Control Number

**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Boulevard  
West Sacramento, CA 95691  
(916) 373-3715  
(916) 373-5471 – FAX  
e-mail: ds\_nahc@pacbell.net

June 27, 2013



Ms. Connie Chung, Senior Regional Planner

**Los Angeles County Department of Regional Planning**

320 W. Temple Street, Room 1356  
Los Angeles, CA 90012

RE: SCH# 2011081042 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the "General Plan Update and Antelope Valley Area Plan Update;" located in northeastern Los Angeles County, California

Dear Ms. Chung:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3<sup>rd</sup> 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

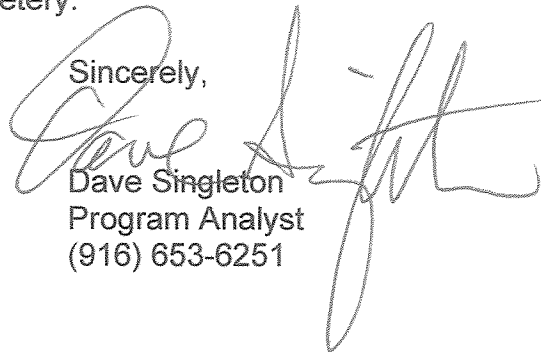
If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a

separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10. Contact has been made to the Native American Heritage Commission for a Sacred Lands File Check. A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.

Also, CEQA Guidelines Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Singleton", written over the typed name and title.

Dave Singleton  
Program Analyst  
(916) 653-6251

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts  
Los Angeles County  
June 27, 2013**

**Beverly Salazar Folkes**

1931 Shadybrook Drive  
Thousand Oaks, CA 91362

805 492-7255  
(805) 558-1154 - cell  
folkes9@msn.com

Chumash  
Tataviam  
Fernandeño

**San Fernando Band of Mission Indians  
John Valenzuela, Chairperson**

P.O. Box 221838  
Newhall, CA 91322

tsen2u@hotmail.com  
(661) 753-9833 Office  
(760) 885-0955 Cell  
(760) 949-1604 Fax

Fernandeño  
Tataviam  
Serrano  
Vanyume  
Kitanemuk

**Fernandeno Tataviam Band of Mission Indians**

Ronnie Salas, Cultural Preservation Department

1019 - 2nd Street, Suite #1  
San Fernando CA 91340

rortega@tataviam-nsn.gov  
(818) 837-0794 Office

Fernandeno  
Tataviam

**Randy Guzman - Folkes**

6471 Cornell Circle  
Moorpark, CA 93021

ndnRandy@yahoo.com  
(805) 905-1675 - cell

Chumash  
Fernandeño  
Tataviam  
Shoshone Paiute  
Yaqui

(818) 837-0796 Fax

**LA City/County Native American Indian Comm**

Ron Andrade, Director

3175 West 6th St, Rm. 403  
Los Angeles, CA 90020

randrade@css.lacounty.gov  
(213) 351-5324  
(213) 386-3995 FAX

**San Manuel Band of Mission Indians  
Daniel McCarthy, M.S., Director-CRM Dept.**

26569 Community Center Drive  
Highland, CA 92346

(909) 864-8933, Ext 3248  
dmccarthy@sanmanuel-nsn.  
gov  
(909) 862-5152 Fax

Serrano

**Kitanemuk & Yowlumne Tejon Indians**

Delia Dominguez, Chairperson

115 Radio Street  
Bakersfield, CA 93305

deedominguez@juno.com  
(626) 339-6785

Yowlumne  
Kitanemuk

**Kern Valley Indian Council**

Robert Robinson, Co-Chairperson

P.O. Box 401  
Weldon, CA 93283

brobinson@iwvisp.com  
(760) 378-4575 (Home)  
(760) 549-2131 (Work)

Tubatulabal  
Kawaiisu  
Koso  
Yokuts

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011081042; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the General Plan Update and Antelope Valley Area Plan Update; located in northeastern Los Angeles County, California.



September 9, 2011

Thuy Hua, AICP, Senior Regional Planner  
Los Angeles County Department of Regional Planning  
320 Temple Street Room 1354  
Los Angeles, CA 90012

Re: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Dear Ms. Hua:

The Building Industry Association Los Angeles/Ventura Chapter (BIA) is hereby responding to the above stated Notice of Preparation. We are opposed to exclusively utilizing the proposed goals, policies, implementing programs and land use designations (density and intensity) the Draft Antelope Valley Area Plan: Town & Country (Draft Plan) as the basis for the draft Environmental Impact Report (EIR) study. The Draft Plan is currently under active review by the community, and has not yet been fully vetted for use in an EIR. Accordingly, we request that the EIR study include the range of land use designations associated with the current Land Use Plan and the Draft Plan.

Although portions of the community were involved in the process of developing the Draft Plan, it is now under review by a broader segment of the Antelope Valley community, who are in the process of creating recommended revisions to the Draft Plan. If the EIR is prepared using only the current Draft Plan, it will limit the opportunity for alternatives to be considered for the Draft Plan.

Furthermore, the BIA has a number of major concerns about the Draft Plan as a whole.

The unincorporated County Regional Housing Needs Assessment (RHNA) target for the projected period of time of the Draft Plan must be studied, and an assessment of how the projected needs will be met through a range of housing types must be demonstrated. The downzoning proposed in the Draft Plan occurs in the most affordable area of the unincorporated County. This downzoning must result in an upzoning in other, less-affordable areas as the current Antelope Valley Area Plan allows for approximately 300,000 units and the Draft Plan reduces this number to approximately 65,000 units. These units must be built elsewhere within the unincorporated County to accommodate the County's predicted population growth in the housing element and Compass Blueprint. The EIR needs to account



NOP EIR Scoping: AV Plan Response

Thuy Hua

September 9, 2011

Page 2

for future growth within the unincorporated areas of the County and illustrate how the shift in housing units out of the Antelope Valley to other areas of unincorporated Los Angeles County will be accommodated.

In addition, the current Draft Plan proposes dramatic increases in the designation of additional lands for Significant Ecological Areas (SEA) and Ecological Transitional Areas, as discussed in the Draft Plan and shown on the Draft Renewable Energy Priority map. These areas have not been scientifically studied and endangered species habitat has not been specifically documented. Therefore, these areas should not be considered accepted nor approved for designation and study by the Draft Plan EIR until they are scientifically demonstrated. Applying a broad-brush habitat conservation approach, without documented studies, results in the effectual taking of property without proof of need.

Government agencies implementing SB 375 should not regard development, or the prohibitions of development, as the sole solutions for meeting their Greenhouse Gas (GHG) emission reduction target. Housing affordability, construction costs and other economic impacts must be considered when evaluating measures proposed for meeting the goals of SB 375.

As stated in the Notice,

“The theme of the Draft General Plan is sustainability. Sustainability requires that planning practices meet the County’s needs without compromising the ability of future generations to realize their economic, social, and environmental goals.”

The General Plan and Draft Plan must allow for a broad range of land use and development options in addressing the stated sustainability goals. By studying the full spectrum of development options in the EIR, the County Board of Supervisors will have a range of options available for approval, not just those proposed in the Draft Plan.

This is the foundation of the BIA request for the EIR study to include the full range of land use designations associated with the current Land Use Plan and the Draft Plan. Otherwise, we request the EIR process not move forward until the Draft Plan has been fully vetted by the community.

Sincerely,



Marta Golding Brown

Antelope Valley Director

Los Angeles/Ventura Chapter



September 14, 2011

Connie Chung, AICP  
Supervising Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012

**Re: Initial Comments - Los Angeles County Draft General Plan Update 2035  
and Notice of Preparation of Draft Environmental Impact Report**

Dear Connie:

On behalf of the members and representative employees who make up the Building Industry Association of Southern California, Inc., Los Angeles Ventura Chapter (BIASC/LAV), thank you for the opportunity to comment on the proposed Draft General Plan (Plan) and the Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR).

Upon initial review of the Plan, we immediately note a very substantial shift in the type and location of future housing for the unincorporated Los Angeles County. We believe that the Plan should better reflect policies that will allow a range of housing options, including affordable housing, while adequately housing the growing population. A reasonable amount of that growth will, we believe, inevitably need to unfold in the north Los Angeles area. Hence, we recommend that the County carefully consider its density projections and especially the Housing Element to sufficiently assure that the housing needs for the future of Los Angeles County will be met.

In particular, major down-zoning is being proposed for north Los Angeles County. Additional information should be provided in the Plan to better explain what prospective changes are anticipated and where shifts in density are tentatively prescribed, both down-zoning of areas and up-zoning of other areas.

To help illuminate the true nature of the proposed changes, the Plan should provide maps and tables in an Appendix which indicate and locate current zoning densities, the proposed new densities, and the respective extents of up-zoning or down-zoning. This information should be made available early in the process to enable land owners and residents to understand the County's vision of the future as well as overall implications to individual parcels. Insertion of maps and tables will aid all land owners, residents and stakeholders in understanding the

proposed changes and the effect the changes could have on their land. The effort to preserve open space, farmland, biological resources, natural habitats, etc. should all be clearly identified on the maps to show current and proposed changes, and – in a separate map – the differences.

Table 2.5 of the Plan identifies a 147% increase in population in the Antelope Valley, a 99% increase in population in Santa Clarita Valley and an overall 39% population increase in Unincorporated Los Angeles County by 2035. Household projections are expected to increase by 148%, 95% and 43%, respectively. Where will this population live – and at what cost of construction? The down-zoning proposals in the Plan indicate less housing opportunities in unincorporated Los Angeles County. Where will affordable housing be located in unincorporated areas? Table C.2 in Appendix B provides the estimated population density that is 20% less than what is projected in Table 2.5. Further study of population should be provided to ensure adequate housing, affordable housing and employment opportunities are provided throughout the county.

With the proposed changes in future density and the drive to move people into more urban areas, it is also important to include maps and tables that highlight where the areas of up-zoning will occur as well as address how the up-zoning will impact traffic, aging and inadequate sized infrastructure for the increased population.

County planners should also be aware that major land use changes could have significant impact on future financing. As credit becomes more and more difficult to obtain, the major down-zoning and up-zoning throughout the county could make it significantly more complicated to obtain financing for construction and development when zoning and use designations are not in compliance with actual development. Standard loans could shift into non-conforming categories, making it more costly and difficult to obtain credit and complete real estate transactions.

The downzoning changes proposed reference a desire for the general plan to preserve environmentally sensitive and hazardous areas. More detailed analysis should be provided to highlight the current Significant Ecological Areas (SEA) to highlight how they are impacted under the current general plan vs. the Plan. Boundary maps should be shown to compare the current and proposed areas and the effects on land use. The same analysis on current general plan vs. Plan should be completed on the Very High Fire Hazard Severity Zone (FHSZ) Policy and map as it relates to justification for density reductions in rural unincorporated areas. Additional mapping should be completed to also highlight the difference between the Cal Fire FHSZ and that proposed by Los Angeles County. The last official Cal Fire FHSZ Map was approved by the State in 1995. Cal Fire is currently drafting a new FHSZ, which proposes significant changes and boundaries as well as new zones. Ideally, both maps should be in line, but in some circumstances they are not and will not be as the local agency has a better understanding of local land use and available infrastructure. However, given that these maps are used significantly for land development, insurance and financing, clear understanding of the boundaries and differences should be identified and referenced in the Plan and DEIR as appropriate.



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Again the drastic density changes in the Plan cannot be adequately analyzed without also updating the Housing Element. The Plan is currently proposing to update nine of the 10 elements of the general plan. The Housing Element is not proposed at this time. It is our understanding that the Department of Regional Planning will update the Housing Element after Southern California Association of Governments (SCAG) releases the Regional Housing Needs Analysis (RHNA) numbers in October 2012 and that once the RHNA numbers are available and after completion of the EIR and General Plan Update, the County will begin working on the Housing Element. Since the current RHNA numbers are good until 2014, and given the significant impacts (traffic, infrastructure, housing costs, etc.) on increasing densities in urban areas, it is important to also update the Housing Element in conjunction with the General Plan Update. The Plan should identify how much is left to build to the 2014 plan. How many units have been built compared to the projections in RHNA, and the current general plan projections. The significant density shifts should be adequate and comply with RHNA.

The Plan identifies several Opportunity Areas where commercial development is encouraged to promote jobs. Figures 2.8 through Figures 2.18 identify several Opportunity Areas with promotion of Rural Town Centers. These same areas are where the major density reduction proposals are sought. An economic impact report of the Opportunity Areas should be completed to evaluate the density reduction proposals in the Plan. How will commercial and retail areas thrive without the needed residential to support the business economy? How will the County retain and attract business without the necessary rooftops to support the businesses? An in-depth economic impact analysis should help ensure that businesses can be supported and that job creation objectives can be met with the proposed reduced densities in rural Los Angeles County.

To supplement the economic impact analysis, a Fiscal Impact Analysis should also be completed that highlights current fiscal impacts as well as proposed. The analysis should focus on affordable housing and where affordable housing will be located. The proposed higher-density, multi-family development is extremely costly to build and therefore would need to be sold at a much higher prices than comparable single family homes. What will an average new home cost the average person to buy or rent? What are the projected incomes of the average resident of Los Angeles County?

The DEIR is slated to address both short and long term effects of the general plan alternatives. Therefore, an evaluation should also be completed to assess the current general plan, short and long term, to review the extent to which the current general plan is most beneficial to the region.

In addition to addressing density and the Housing Element, the Plan and DEIR should also be consistent with other related plans and the spirit of SB 375.

While preparing the Santa Clarita Area Plan, One Valley One Vision (OVOV), County planners worked directly with the City of Santa Clarita to ensure mutual goals and objectives were met. Has the same occurred with the City of Palmdale and Lancaster and local utilities? Do the local city general plans and zoning requirements, as well as existing and planned infrastructure accommodate the increased growth outlined in the Plan? Full analysis of the density proposals should be completed to accommodate for the future housing needs both in the unincorporated county area as well as the neighboring cities and communities that will accommodate the increased densities. This would include impacted areas in the entire Los Angeles basin including the communities in the Antelope Valley. Street and roadway plans, sewer plans, water procurement, etc. in all jurisdictions where up-zoning is proposed should be reflect the proposals of the Plan.

How does the Plan provide consistency with SB 375? What CEQA streamlining measures will be available? Has enough analysis been completed to ensure there is no conflict with local area plans? Can the communities and neighborhoods accommodate the added densities proposed? Do impacted cities have adequate infrastructure to accommodate growth?

The Plan, in essence, seeks to eliminate lateral urban expansion, which – at its worst – is called sprawl. But the policies proposed would necessarily implicate a great many individual project proposals which are presently foreseeable and worthy of approval. Policy LU 1.5 – in particular – is a very concerning policy, as it purports to prohibit project-specific amendments and eliminate expanded capacity of the roadway network for future growth. BIASC/LAV suspects that such a provision would not pass legal muster, given that the Supervisors may not tie their own hands in such a manner. Apart from this, the policy would preclude new residential proposals which could in fact be directly adjacent to current approved parcel or tract maps that are yet to be built. Increased residential densities in these circumstances would not be urban sprawl, but traditional growth in a region. Road expansions and improvements in urban areas are always welcomed and almost always warranted for new residential or commercial developments and often aid in the reduction of congestion and improve existing conditions. County should look for all so-called “Smart Growth” opportunities and encourage wherever possible and avoid policies that make good development an expensive and complicated undertaking.

This additional analysis will enable us to better understand the need for the dramatic density reductions in the rural areas.

The 2035 General Plan and Area Plans should also provide much-needed flexibility. No one can predict the future and a means to address future changes should be provided without under-going needless hurdles by “Applicants”. We are concerned with Policy LU1.2 of the Plan, that “discourages project-specific amendments to the text of the General Plan...” and the Land Use



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Policies that could make needed General Plan Amendments complex, time-consuming and costly should they be deemed out of compliance with the Goals and Policies of the General Plan.

In the Plan and the Santa Clarita Valley Area Plan update (OVOV), the plan and zone lines correspond with the GIS-delineated parcel and roadway lines allowing for increased accuracy. However, there are instances in which this increased accuracy could have unintended consequences causing unnecessary administrative difficulties that could require plan amendments/zone changes. The Plan should provide flexibility in such instances so that amending these newly adopted plans would not be necessary. Both the existing general plan and the Santa Clarita Valley Area Plan provide provisions for plan line delineation that allow flexibility, which appears to have been eliminated from the updated plans.

Examples of why the Plan should provide flexibility follow, and would be useful for both applicants and the County when land use designation boundaries encroach into projects (for example; by 5 feet, 20 feet, 100 feet or more).

1. In the Plan and OVOV, there are instances where proposed land use designations follow a proposed highway alignment. However, upon final IEC approval, the roadway alignment may not match that of the proposed highway alignment indicated in the updated plans.
2. If a road is realigned for some reason (e.g., to save an oak tree) and the resulting bisected property has two land use designations, that may make the proposed project inconsistent with the newly adopted land use and zoning designations.
3. A future subdivision of land, or other proposed project, may cross two or more parcels (held under single ownership) with different land use designations. In the event that a project is proposed across two parcels with different land use designations that otherwise meet the criteria for each of the designations, the boundary of the land use designation should be able to be adjusted to follow final parcel lines without a plan amendment.
4. Lot line adjustments between parcels with different land use designations should have a mechanism to adjust the final land use designations without a plan amendment.

In the absence of such flexibility, the County would be complicating a variety of otherwise relatively straightforward development projects, including new projects, redevelopment projects, and Transit Oriented Development projects.

Solutions that would allow for flexibility or substantial conformance procedures that could allow the County, at an administrative level, to adjust boundaries without a formal plan amendment are presented below. BIASC/LAV respectfully urges that they be included in the DEIR among the alternatives and, preferably, with primacy therein.

1. Include similar language that is in the existing Santa Clarita Valley Area Plan.
2. Allow for a process similar to that of the City of Los Angeles' Zone Boundary Adjustment process.

*Individual Adjustments: The Director may, upon written request and after notice and hearing to the owners of the property affected by the proposed decision, make minor adjustments in the locations of zone boundaries to carry put the intent of this section when:*

1. Include a Substantial Conformance determination process similar to the process outlined in the adopted Newhall Ranch Specific Plan (section 5.2)

The solution may also be a combination of any of these measures.

Of final note, the NOP for the DEIR notes it will address potential ordinance updates, changes and additions. Some portions of the draft Plan also reference ordinance language (Quimby Act for example). An overview of current vs. proposed policy should be identified for ease in understanding what is new, what has been changed or modified and what remains the same within the ordinances and which ordinances, polices and manuals have been rescinded.

Sprawl has been identified as a key issue within the Plan. Sprawl apparently contributes to traffic congestion as there are no transit options, yet no TOD has been identified in the unincorporated north Los Angeles County area in the Draft General Plan TOD Policy Map. How will the County encourage infill and higher densities in these areas without TODs?

BIASC/LAV would also like to request the staff consider inclusion on analysis for future speculative developments. Our membership has been asked by Leading Agencies to incorporate analysis in the ir project EIRs for such projects including analysis of High Speed Rail (In Antelope Valley or the I-5 Corridor) and the effects on traffic reduction; the proposed Palmdale Regional Airport and potential effects on air space with increased densities; as well as the future High Dessert Corridor and impacts on the rural communities.

With the significant amount of work that has been presented in the draft Plan and Antelope Valley Area Plan, the BIA would like to request additional time to continue review of the plans and provide comment. We are currently meeting with Department of Regional Planning staff to



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have detailed informational discussions on selected elements of the Draft General Plan. It would be appreciated if we could continue to meet with staff and provide further comment at a later date.

Given the substantial amount of evaluation and analysis that remains to be completed within the Draft General Plan, the BIA would like to request that the County complete and provide the additional studies and update the Draft for continued public review and comment.

Thank you again for allowing the Building Industry Association of Southern California, Los Angeles/Ventura Chapter to provide initial comments. We look forward to working with you further on this extensive undertaking.

Sincerely,

*Holly Schroeder*

Holly Schroeder  
Chief Executive Officer

C: Mr. Richard Bruckner, Los Angeles County Director of Planning and Development  
Ms. Thuy Hua, Los Angeles County Dept. of Regional Planning Sr. Regional Planner  
Sandy Sanchez, BIASC/LAV Director of Government Affairs  
Marta Golding Brown, BIASC/LAV Antelope Valley Director





Southern California  
Los Angeles and Ventura  
Counties Chapter

July 29, 2013

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Connie Chung, AICP  
Supervising Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012

#### **Re: Comments - Los Angeles County Revised Notice of Preparation and Scoping of Draft Environmental Impact Report**

Dear Connie:

On behalf of the members and representative employees who make up the Building Industry Association of Southern California, Inc., Los Angeles Ventura Counties Chapter (BIA), thank you for the opportunity to comment on the Revised Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR).

The BIA continues to note a very substantial shift in the type and location of future housing for the unincorporated Los Angeles County. We believe that the General Plan (the Plan) should better reflect policies that will allow a range of housing options, including affordable housing, while adequately housing the growing population. A reasonable amount of that growth will, we believe, inevitably need to unfold in the north Los Angeles area. Hence, we recommend that the County carefully consider its density projections and especially the Housing Element to sufficiently assure that the housing needs for the future of Los Angeles County will be met.

In particular, major down-zoning is being proposed for north Los Angeles County. Additional information should be provided in the Plan to better explain what prospective changes are anticipated and where shifts in density are tentatively prescribed, both down-zoning of areas and up-zoning of other areas.

To help illustrate the true nature of the proposed changes, the Plan should provide maps and tables in an Appendix which indicate and locate current zoning densities, the proposed new densities, and the respective extents of up-zoning or down-zoning throughout the county. This information should be made available early in the process to enable land owners and residents to understand the County's vision of the future as well as overall implications to individual parcels. Insertion of maps and tables will aid all land owners, residents and stakeholders in understanding the proposed changes and the effect the changes could have on their land. The effort to preserve open space, farmland, biological resources, natural habitats, etc. should all be clearly identified on the maps to show current and proposed changes, and – in a separate map or table– the differences.

With the proposed changes in future density and the drive to move people into more urban areas, it is also important to include maps and tables that highlight where the areas of up-zoning will occur as well as address how the up-zoning will impact traffic, aging and inadequate sized infrastructure for the increased population.

Down-zoning, like up-zoning will affect the outcome of the Plan EIR. For Plan consistency, currently drafted community based plan updates and associated EIR's, such as the East Los Angeles 3<sup>rd</sup> Street Plan and the Antelope Valley Area Plan, should be completed prior to Plan approval, as these updates will affect densities and the jobs housing balance within the County.

As an example: the *Preliminary Draft Antelope Valley Area Plan: Town & Country, March 2011* (AVAP) EIR has been separated from the Plan EIR, but it is still an active draft plan. However, the Revised NOP of the DEIR notice in Table 1, page 12, note 7 states, "The Antelope Valley Area Plan represents the adopted plan..." with Table 1 reflecting the unit count from the 1986 adopted plan. It seems disingenuous to use the 1986 residential unit count in the Plan EIR as noted in the Revised Plan NOP. This land use plan, in no way, reflects the Department's current 2011 Draft AVAP land use. The 2011 Draft AVAP reduces the 1986 unit count from 278,158 to 67,463. This is a reduction of over 75% of housing units in the Antelope Valley from the adopted 1986 area plan. Therefore, the Plan and the AVAP, while having separate EIR's, should proceed simultaneously and findings from the area plan should be incorporated into the final version of the Plan.

County planners should also be aware that major land use changes could have significant impact on future financing. As credit remains difficult to obtain, the major down-zoning and up-zoning throughout the county could make it significantly more complicated to obtain financing for construction and development when zoning and use designations are not in compliance with actual development. Standard loans could shift

into non-conforming categories, making it more costly and difficult to obtain credit and complete real estate transactions.

One on the Major Policies of the proposed Plan is "Expanding Significant Ecological Areas" for the preservation of genetic and physical diversity of the County by designing biological resource areas capable of sustaining themselves into the future' which results in the downzoning of substantial parcels -and significant expansion of the designated Significant Ecological Areas (SEA.) This policy is in addition to existing CEQA processes that requires full analysis of project impacts on habitat, and supplements federal and state regulatory programs. The SEA program should not duplicate existing programs. In addition, more detailed analysis and studies should be provided to highlight the current SEA impacted under the current General Plan vs. the Plan. The analysis and studies should identify specific studies utilized to expand each area proposed as designated SEA. Boundary maps should be shown to compare the current and proposed areas and the effects on land use. The same analysis on current General Plan vs. Plan should be completed on the Very High Fire Hazard Severity Zone (FHSZ) Policy and map as it relates to justification for density reductions in rural unincorporated areas. We are pleased to see that with the release of the Southern California Association of Governments (SCAG) release of the Regional Housing Needs Analysis (RHNA) numbers in October 2012 and that the county is now also updating the Housing Element (HE). The previous NOP specifically excluded the HE because of timing. The Revised NOP is unclear whether the HE will be analyzed. The County has released a draft HE, therefore the EIR should include a HE analysis as part of the General Plan Update. The Plan should identify how much is left to build to the 2014 plan, how many units have been built compared to the projections in RHNA, and the current general plan projections. The significant density shifts should be adequate and comply with RHNA.

The Plan identifies several Opportunity Areas where commercial development is encouraged to promote jobs. Figures 2.8 through Figures 2.18 identify several Opportunity Areas with promotion of Rural Town Centers. These same areas are where the major density reduction proposals are sought. An Economic Impact Analysis of the Opportunity Areas should be completed to evaluate the density reduction proposals in the Plan. How will commercial and retail areas thrive without the needed residential to support the business economy? How will the County retain and attract business without the necessary rooftops to support the businesses? An in-depth Economic Impact Analysis accompanied by a Fiscal Impact Report to help ensure that businesses can be supported and that job creation objectives can be met with the proposed reduced densities changes in Los Angeles County.

To supplement the economic impact analysis, a Fiscal Impact Analysis should also be completed that highlights current fiscal impacts as well as proposed. The analysis

should focus on affordable housing and where affordable housing will be located. The proposed higher-density, multi-family development is extremely costly to build and therefore would need to be sold at a much higher price than comparable single family homes. What will an average new home cost the average person to buy or rent? What are the projected incomes of the average resident of Los Angeles County?

The DEIR is slated to address both short and long term effects of the general plan alternatives. Therefore, an evaluation should also be completed to assess the current general plan, short and long term, to review the extent to which the current general plan is most beneficial to the region.

In addition to addressing density and the Housing Element, the Plan and DEIR should also be consistent with other related plans and the spirit of SB 375.

While preparing the Santa Clarita Area Plan, One Valley One Vision (OVOV), County planners worked directly with the City of Santa Clarita to ensure mutual goals and objectives were met. Has the same occurred with all 88 cities in the county and the local utilities? Do the local city general plans and zoning requirements, as well as existing and planned infrastructure accommodate the increased growth outlined in the Plan? Full analysis of the density proposals should be completed to accommodate for the future housing needs both in the unincorporated county area as well as the neighboring cities and communities that will accommodate the increased densities. This would include impacted areas in the entire Los Angeles basin including the communities in the Antelope Valley. Street and roadway plans, sewer plans, water procurement, etc. in all jurisdictions where up-zoning is proposed should be reflect the proposals of the Plan.

The 2035 General Plan and Area Plans should also provide much-needed flexibility. No one can predict the future and a means to address future changes should be provided without under-going needless hurdles by "Applicants". We are concerned with policy that "discourages project-specific amendments to the text of the General Plan..." and the Land Use Policies that could make needed General Plan Amendments complex, time-consuming and costly should they be deemed out of compliance with the Goals and Policies of the General Plan. We are attaching our original NOP comment letter that articulates these concerns in detail for your reference.

Solutions that allow for flexibility or substantial conformance procedures that could allow the County, at an administrative level, to adjust boundaries without a formal plan amendment are presented below. BIA respectfully urges that they be included in the DEIR among the alternatives and, preferably, with primacy therein.

Of final note, the NOP for the DEIR notes it will address potential ordinance updates, changes and additions. Some portions of the draft Plan also reference ordinance

language (Quimby Act for example). An overview of current vs. proposed policy should be identified for ease in understanding what is new, what has been changed or modified and what remains the same within the ordinances and which ordinances, polices and manuals have been rescinded.

Sprawl has been identified as a key issue within the Plan. Sprawl apparently contributes to traffic congestion as there are no transit options, yet no TOD has been identified in the unincorporated north Los Angeles County area in the Draft General Plan TOD Policy Map. How will the County encourage infill and higher densities in these areas without TODs?

BIA would also like to request the staff consider inclusion on analysis for future speculative developments. Our membership has been asked by Leading Agencies to incorporate analysis in their project EIRs for such projects including analysis of High Speed Rail (In Antelope Valley or the I-5 Corridor) and the effects on traffic reduction; the proposed Palmdale Regional Airport and potential effects on air space with increased densities; as well as the future High Dessert Corridor and impacts on the rural communities.

Given the substantial evaluation and analysis required to complete the GP and EIR update process, we strongly urge and encourage the County to consider adoption of policies that do not create unintentional hurdles to economic growth, housing affordability and obstacles to housing and development.

Thank you again for allowing the Building Industry Association of Southern California, Inc., Los Angeles/Ventura Counties Chapter to provide initial comments. We look forward to continuing the dialog on this extensive undertaking.

Sincerely,

*Holly Schroeder*

Holly Schroeder  
Chief Executive Officer

Attachment 1 - Response to Notice of Preparation-EIR  
Attachment 2 - General Plan NOP Response 9-11

C: Mr. Richard Bruckner, Los Angeles County Director of Planning and Development  
Ms. Thuy Hua, Los Angeles County Dept. of Regional Planning Sr. Regional Planner  
Sandy Sanchez, BIASC/LAV Director of Government Affairs  
Marta Golding Brown, BIASC/LAV Antelope Valley Director

## Connie Chung

---

**From:** Carla Bollinger [Carla.Bollinger@halo.com]  
**Sent:** Monday, July 29, 2013 4:40 PM  
**To:** DRP General Plan  
**Subject:** LA County General Plan: Santa Susana/Simi Hills SEA 23 - comment CNP Coalition

**Importance:** High

## Chatsworth Nature Preserve Coalition

Working together to save a crucial wildlife habitat in Los Angeles-San Fernando Valley

[www.savechatsworthpreserve.org](http://www.savechatsworthpreserve.org)

*A meadowlarks needs a meadow to sing*

July 29, 2013

Connie Chung, AICP  
Supervising Regional Planning  
Dept. of Regional Planning  
Los Angeles County  
320 West Temple St., Room 1356  
Los Angeles, CA 90012

Submitted to e-mail address: [genplan@planning.lacounty.gov](mailto:genplan@planning.lacounty.gov)

Re: COMMENTS: Los Angeles County General Plan Update: Unincorporated Areas, specifically Santa Susana Mountains/Simi Hills SEA 23

We are concerned with the need for LA County to save open space in the Santa Susana Mountains/Simi Hills for the preservation of wildlife and natural resources vital to preserving the Chatsworth Nature Preserve (CNP) and Rim of the Valley Wildlife Corridor. In 1994 the LA City Council and mayor signed the LA City Ordinance No. 169723 changing the Chatsworth Reservoir, 1300 acres, to a Nature Preserve with limited uses. This nature preserve, the largest remaining natural area in the San Fernando Valley-Los Angeles, is a vital habitat for Southern California wildlife from amphibians and reptiles, larger animals including the mountain lion and bobcats, and more than 200 species of birds, both local residents and migratory birds. The CNP habitat includes oak woodlands and savanna, riparian areas, chaparral, grassland, and an Ecology Pond. The CNP seasonal wetlands and vernal pools are crucial to all wildlife and are supported by the Simi Hills' streams and seasonal water runoff.

The proposed developments such as the Woolsey Canyon Estates and single built mansions in the Simi Hills are a detriment to the preservation of the CNP and the wildlife corridor between the Santa Monica Mountains and Santa Susana Mountains and beyond. Mansions and residential developments are altering the directional flow of water, increasing debris and mud flow to the CNP Ecology Pond, a vital water source for wildlife and native vegetation. Development also threatens the endangered/rare plants such as the San Fernando Valley Spine flower and Santa Susana tarplant. Urban sprawl into unincorporated areas of the Santa Susana Mountains-Simi hills must cease to protect the region's natural resources and all Southern California wildlife.

Sincerely,

Carla Bollinger and  
CNP Coalition  
[Carla.bollinger@halo.com](mailto:Carla.bollinger@halo.com)

Mark Osokow  
CNP Coalition  
[Mark.Osokow@sfvaudubon.org](mailto:Mark.Osokow@sfvaudubon.org)



Susan Zahnter  
Concerned Citizens of the Western Antelope Valley  
Friends of the Antelope Valley Open Space  
P O Box 786  
Lake Hughes, CA 93532  
[susan@avopenspace.org](mailto:susan@avopenspace.org)

SENT VIA EMAIL

29July 2013

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

Dear Ms. Chung,

Re: Revised Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meeting, General Plan 2035

We are advised that the Antelope Valley Areawide Plan (AVAP) will have a separate environmental impact report, but also know that the AVAP will necessarily comport with the updated General Plan (GP). Certainly, all of the impacts of the revised Plan will be reviewed and, hopefully, adequate mitigation or changes to the Plan will be applied.

Our group has several concerns which we believe should be reviewed in the EIR. One of major importance is availability of water to anticipated development and agricultural areas. Does the eighty percent of GP projected total build out rest upon water availability that matches build out and other increased demand, including urban areas? The GP states protection of historically farmed agricultural land. How will future water use affect that?

Please explore the effects of utility-scale renewable energy policies and congruity of policies that seek to protect scenic areas, public and private open space, parks, wildlife sanctuaries, SEAs, State Parks, and state and federal lands. How will promotion of utility-scale renewable energy preserve those areas mentioned above? How will the GP protect scenic areas not limited to state designated scenic highways? How is allowance of mineral extraction in SEAs deemed compatible?

Certain land uses designated Open Space are not compatible with some surrounding urban and rural land uses, such as Off-Highway Vehicle Recreation Areas, or highly modified areas like golf courses or landscaped parks. Evaluate effects of adjacent incompatible land uses near natural or rural areas under all jurisdictions and privately held lands.

What are the effects of proposed new transportation, public transit, expanding highways, etc., and subsequent air quality degradation on areas near or within SEAs, State Parks, County Parks and Sanctuaries, agricultural preservation lands, private conservation lands, designated County-recognized wildlife corridors (including special status species in those areas mentioned), and rural properties.



Consider the value of preserved open space, agricultural lands, and desert landscapes as vital to reduction of greenhouse gases. Just as in the GP's Urban Greening Program, discuss the value of retaining natural landscapes and placing restrictions on their removal or modification. It would seem most cost-effective to leave them as they are, instead of "recreating" them in the future. Will commercial utility-scale renewable energy create something akin to urban heat islands and how will that affect adjoining environments?

If changes to the Land Use Map to increase densities and commercial zones in unincorporated areas that are subject to special hazards, such as earthquake, fire, and flood are implemented, then describe effects to existing rural communities; and federal, state, county, and privately conserved open space lands.

We appreciate the opportunity to participate in this process of review as the General Plan 2035 moves forward. As ever, our concerns reflect our desire to protect open space, its commensurate wildlife, and rural communities to the greatest extent we can.

Respectfully,

A handwritten signature in cursive script that reads "Susan Zahnter". The signature is written in black ink and is positioned above the printed name.

Susan Zahnter  
Concerned Citizens of the Western Antelope Valley  
Friends of the Antelope Valley Open Space



## Santa Susana Mountain Park Association

*Dedicated to the Preservation of the Santa Susana Mountains and Simi Hills*

P.O. Box 4831  
Chatsworth, CA 91313-4831  
[ssmpa.com](http://ssmpa.com)

July 29, 2013

Connie Chung, AICP  
Supervising Regional Planner  
Dept. of Regional Planning  
Los Angeles County  
320 West Temple Street, Room 1356  
Los Angeles, CA 90012

Re: Comments by Santa Susana Mountain Park Association (SSMPA) - Response to Notice of Preparation (NOP) June 2013, of a Draft Environmental Impact Report for Los Angeles County General Plan Update

Dear Ms. Chung,

We are an organization that has been involved for over 40 years with preserving open space areas in the Santa Susana Mountains and the Simi Hills.

Of the greatest current concern to us is the incredibly critical nature of a viable wildlife corridor that would provide transitional habitat to allow wildlife to move between the Santa Monica Mountains National Recreation Area and the Los Padres Forest to the north and the Angeles Forest to the east. To be viable, a habitat corridor of very significant width is needed to allow deer and mountain lions, in particular to traverse selected large open space parcels, in northern West Hills, and westerly Chatsworth, such as the Upper Las Virgenes Open Space Preserve (former Ahmanson Ranch), the Chatsworth Nature Preserve, the Santa Susana Pass State Historic Park.

We request that in addition to the appropriate concerns and safeguards to aid preservation of open space, outlined in your SEA considerations, that Los Angeles County Regional Planning implement a study to determine the optimal path for such a transitional habitat. We further request that County implement a planning process to outline appropriate use in the area, that provides for good habitat for wildlife corridors.

We have recently seen the County participate in the following discretionary approvals that show the critical need for a cohesive planning process as requested here:

- a. transfer land north of Porter Ranch to the City (i.e. Hidden Creeks; surrounded by blue-line streams, critical habitat in our dry climate),
- b. approve lands north of the 118 freeway between Topanga Canyon and Canoga Avenue for development (Deerlake Ranch), and

Ms. Connie Chung  
Comments on General Plan Update  
Page 2

- c. approve development of property to the west of Chatsworth Nature Preserve (Dayton Canyon).

We are concerned that the County has no global plan to establish this critical wildlife corridor, and the development "march" up our surrounding hillsides continues, using a variety of techniques to develop the hillsides, notwithstanding the county SEA's.

We suggest the only way to effectively manage the remaining open space is to set a development moratorium for any unapproved project to provide the County time to develop an appropriate plan:

- A. that is protective of an optimal path for wildlife habitat (a wildlife "corridor"), based on the areas that still are not developed in west and northerly San Fernando Valley, and
- B. that is a significant width to minimize being lit up at night due to nearby development and allow larger mammals such as deer and mountain lion to pass and be able to feed when they are in that area.

Without a global plan, the remaining undeveloped lands (such as along Woolsey Canyon which bridges the Upper Las Virgenes Open Space/Santa Susana Field Lab to the Chatsworth Nature Preserve) will be subjected to piecemeal development. Having a plan, and setting development within that region to a specific and pre-established development plan, is the only chance to retain any viable open space for wildlife connectivity. Of course, the various considerations outlined in all the SEA's must be considered as this plan is developed and implemented.

It should be noted also, that the County should consider the National Park Service's Rim of the Valley Corridor Trail Study presently underway and should incorporate features in the Rim of the Valley plan, expected out next year, in its land use plan. Consideration of related projects is a cornerstone in environmental law, and we encourage similar considerations in development of a regional plan, and the open space and land use elements.

We welcome feedback on your thoughts and hope comments such as ours will help the County craft a more viable, protected Regional Plan in our area of the northwest San Fernando Valley. Prudent planners feel that infill development is a better idea, but clear guidance from Regional Plans, and Regional Planning Departments, is necessary to provide the public better indications about specific open space goals and guidelines, with much clearer instructions for preservation of key habitat in this area. The County needs to stop small developments that irrevocably destroy key open space linkages that must be preserved for the future.

Sincerely,



Teena A. Takata

President, Santa Susana Mountain Park Association

**About Santa Susana Mountain Park Association:**

Santa Susana Mountain Park Association is a 42 year-old non-profit organization based in Chatsworth, Los Angeles, California.

We represent approximately 700 members and concerned citizens, and we partner with many organizations to promote ecological and recreational quality in Southern California.

SSMPA's mission is to preserve and protect the Simi Hills, Santa Susana Mountains, and surrounding open space.

**SSMPA Board of Directors:**

Teena Takata, John Luker, Vanessa Watters, Diana Dixon-Davis, Bob Dager, Carla Bollinger, Warren Stone, Donna Nachtrab, Tom Nachtrab

## Connie Chung

---

**From:** Carla Bollinger [Carla.Bollinger@halo.com]  
**Sent:** Friday, July 26, 2013 11:45 AM  
**To:** DRP General Plan  
**Subject:** COMMENTS: LA County General Plan  
**Attachments:** c001i047.jpg; horserider.jpg; HPIM1887.JPG

July 26, 2013

Connie Chung, AICP  
Supervising Regional Planning  
Dept. of Regional Planning  
Los Angeles County 320 West Temple St., Room 1356  
Los Angeles, CA 90012

Re: Comments: Los Angeles County General Plan Update: Unincorporated Areas

Dear Ms. Chung:

I request your consideration in regards to the Santa Susana Mountains/Simi Hills SEA 23:

**Saving Natural Resources-Land Design Use:** Requesting LA County stop urban sprawl by promoting county-city redevelopment and usage of existing commercial offices, buildings, blighted areas through tax incentives and negotiated long-term leases to reduce the justification of new building encroaching on open space. Continue urban development through smart growth development encompassing extension of public transportation, Metrolink rail lines-Metrol bus and building of neighborhood multi-unit residences complete with parks, schools, and shopping centers in existing urban areas.

**Open Space-Land Preservation:** Preserve the natural resources in the Santa Susana Mountains and foothills and Simi Hills (SEA23). This sensitive wildlife corridor is being destroyed by irresponsible development such as the proposed Hidden Creek Estates, an extension of Porter Ranch community, and the Woolsey Canyon Estates in the Simi Hills. These developments and any other future proposed developments in the SEA23 region are a threat to a critical wildlife corridor habitat link between the Santa Monica Mountains to the Los Padres National Forest and beyond. To prevent extinction of large and small animals, including mule deer, mountain lions, bobcats, coyotes, raccoons, badgers, amphibians and reptiles, eagles, hawks, condors, and many other walking, crawling, and flying animals in Southern California, this fragile link must be preserved as open space.

### BIOTIC RESOURCES

**Air:** To combat urban pollution, California oak trees, oak woodlands and savannahs, riparian woodlands, sagebrush and mixed chaparral help offset carbon dioxide to naturally provide cleaner air. It doesn't make sense to destroy these natural resources, all too often sacrificing large oaks for developments when it takes up to 100 years to replace a full-grown mature oak tree. It makes sense to preserve the remaining "protected" oak trees and all native trees and plants.

**Water:** The SEA23 has blue streams and seasonal streams that feed the Los Angeles River and Chatsworth Nature Preserve. Example: Browns Canyon Creek, a blue stream a water source for the LA River, is under threat of destruction from the proposed Hidden Creek Estates development. The Simi Hills streams and seasonal water runoff supply the Chatsworth Nature Preserve. Mansions and housing already built in the Simi Hills on the north end above Chatsworth Nature Preserve have diverted the natural flow of water causing increased silt and mud flow to the ecology pond, a once vital source of water for all wildlife. The seasonal rain from Woolsey Canyon Creek feeds the Chatsworth Nature

Preserve ground water and seasonal vernal pools and ponds is under threat of destruction from the proposed Woolsey Canyon Estates.

**Hill and Mountain Ranges:** The Santa Susana Mountains-Simi Hills are a unique wild land with sandstone rock outcroppings of scenic boulders, canyons, slopes, dense vegetation, supporting endangered and rare plants such as the San Fernando Valley Spineflower and Santa Susana tarplant. The native trees, CA Live Oak, Valley Oak, Scrub Oak, California walnut and sycamore, support the many birds and other wildlife for nesting and food. Sage, buckwheat, ceanothus (California Lilac) and a variety of sagebrush, are part of the hillsides' chaparral, vegetation that supports wildlife, local and migratory birds, and the natural beauty of the region.

**Scenic Resources:** Missing in Southern California is a Scenic Corridor of the Santa Susana Pass between northwest San Fernando Valley and Simi Valley along both the 118 Freeway and the Santa Susana Pass Road which the Santa Susana Pass State Historic Park borders on the north side. The Chatsworth Formation of panoramic sandstone outcroppings, rocks, geological units such as the Garden of the Gods, Chatsworth Peak, Stony Point and vegetation are the backdrop to thousands of historic movies, Western movies and TV shows filmed between the 1930's through the 1980's. The 118 Fwy. And Santa Susana Pass Road need to be added by CALTRANS as a designated scenic corridor. Culverts with vegetation need to be developed providing safer wildlife passage between the Santa Susana Mountains and the Simi Hills straddling Los Angeles-Ventura Counties.

**Cultural Heritage Resources:** The Santa Susana Mountains-Simi Hills is an archaeological landscape with village, ceremonial, and burial sites. This region is where three Native American tribes converged, Chumash, Fernandeno/Tatviam and Tongva. Significant archaeological assets, rock art/pictograph, cupulas, bedrock mortar, and other artifacts need to be protected from development. Transportation hub: Spanish missionaries seeking an easier passage than the Pacific Coast-Kings Highway (Fwy 101) between Ventura Mission and missions further north traveling between the San Fernando Mission traversed through the historic Santa Susana Pass. The Old Stagecoach Trail-Devil's Slide and later railroad track-tunnels were built through the Santa Susana Pass as a commuter route between Los Angeles and northern California. The railroad route is still in use today. All of these historical-cultural sites need protection from development and visual degradation.

**Recreation Resources:** The existing trails for hiking, biking, and equestrian use and possible future trails when the Rim of the Valley wildlife Corridor Act passes are needed by Los Angelenos lacking recreational places to enjoy. The health, physical and psychological, for humans is dependent on recreational activities, visual scenic beauty and visits to the natural environment. Urban sprawl into the natural world causes greater stress on the psyche for both children and adults. Los Angeles County must serve as a beacon for all counties by preserving land/open space for recreational resources.

**Land Capability with negative environmental factors:** Historic and legendary Santa Ana winds race through the Santa Susana Mountain foothills and Simi Hills. These winds are especially hazardous during the dry summer-fall months as they play havoc with the natural occurrence of wild fires. Building in this region is irresponsible in terms of probable destruction and cost. The developers do not carry the burden of cost for wildfires, escalating insurance cost, evacuations, and government supported fire fighters and equipment. Then during occasional heavy rains, landslides, mud slides, unstable land shift occurs that also mandates common sense must prevail by not building in these undeveloped areas. The Santa Susana Mountain foothills are riddled with seismic activity-faults and not stable for any development.

I hope that LA County Regional Planning will consider the need to protect open space, natural resources, scenic vistas, cultural heritage resources, and recreational needs for the future survival and well-being of both wildlife and humans.

Sincerely,

Carla Bollinger

**Comment submitted as an individual and not the membership and participation of affiliations noted:**

Allied Artists of Santa Monica Mountains, SFV Audubon Society, LA/SFV Chapter Sierra Club, Southwestern Herpetologists, life member of Santa Susana Mountain Park Association, Chatsworth Historical Society, delegate of Chatsworth Nature Preserve Coalition, participant of The Rim of the Valley Wildlife Corridor Study and National Historic Preservation Act (NHPA) Section 106 SSFL.

Attached Photos: by Henry Bollinger: Santa Susana Pass-F=118 Fwy at Topanga Canyon, Horserider at Chatsworth Trails Park, Seasonal Waterfall in Woolsey Canyon

Topanga Cyn Blvd 27 1/2  
Rocky Peak Rd 2 1/4  
Kuehner Dr 5











2000 Oak Street, Suite 250 • Bakersfield, CA 93301  
Ph: (661) 323-4005 • Fax: (661) 323-4006  
www.BolthouseProperties.com

July 29, 2013

Connie Chung, AICP  
Supervising Regional Planner  
Los Angeles County  
Department of Regional Planning  
320 W. Temple Street, Room 1356  
Los Angeles, CA 90012

**RE: Revised Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meeting**

Dear Ms. Chung,

Bolthouse Properties currently owns numerous parcels in unincorporated Los Angeles County that will be subject to the Los Angeles County General Plan Update in the Antelope Valley region. These properties, totaling approximately 4,400 acres lie adjacent to and east of the Cities of Lancaster and Palmdale, and many of them are located in the proposed enlargement of the Antelope Valley Significant Ecological Area.

We have reviewed the Revised Notice of Preparation for the Los Angeles County General Plan and would like to convey to the County our existing and future interests for our holdings. In particular, our continued interest in maintaining and preserving the agricultural use of our properties as well as protecting out interest for future utility scale renewable energy production in the proposed Antelope Valley SEA.

**Existing and proposed General Plan Update Land Use and Zoning Designations**

In accordance with the 1986 Antelope Valley Area Plan, our land that currently lies within the unincorporated area of Los Angeles County is designated as Non-Urban 1 (N-1), and one parcel is split between N-1 and Commercial. The N-1 designation is intended to, "preserve agricultural uses, limit density, promote clustered development and conserve open space and natural area," and allows for the development of single-family homes, equestrian and animal uses, and agricultural and related activities. Under this existing designation, Bolthouse Properties is involved in agricultural activities and has future plans for residential development on our lands.

According to the Revised NOP for the General Plan Update, all parcels will change to Rural Land 20 (RL20). The RL20 designation allows for the development of single family homes, equestrian and

animal uses, and agricultural and related activities, with a maximum density of 1 du per 10 gross acres and a maximum FAR of 0.5. According to our information, the RL20 designation would classify these parcels as part of the County's Rural Preserve. We agree with the County of Los Angeles in that the RL20 land use designation is appropriate for our properties. We would like to express to the County our support in maintaining these land use designations to protect our existing and future agricultural interests.

### **Draft Renewable Energy Production Priority Map & Renewable Energy Ordinance**

It is our understanding the Draft Renewable Energy Production Priority map, which was publically introduced at a community meeting on June 18, 2011 has been retracted due to concerns raised by stakeholders. In place of the Draft Renewable Energy Production Priority Map, the County will be drafting a Renewable Energy Ordinance. This ordinance is anticipated to incorporate the information used in the development of the Draft Renewable Energy Production Priority Map, but it will also address more specific concerns, such as locational criteria, decommissioning, and development standards. It is our understanding that based on preliminary discussions with County staff; a solar project would be subject to a CUP under the Renewable Energy ordinance for lands designations RL-20/A-2-2.

Bolthouse Properties currently has land under option to be developed as utility scale solar energy projects. This land, which consists of approximately 1,570 acres, is further described below:

- 32 parcels totaling 320 acres located in the northeast corner of the City of Lancaster.
- One 160 acre parcel located southwest of the E Palmdale Blvd. and 165<sup>th</sup> Street E intersection.
- Four parcels totaling 1,090 acres southeast of the E Avenue P and E Palmdale Blvd. intersection.

Bolthouse Properties has and continues to work diligently with the County, State, and utility companies to further pursue these solar options. In fact, the options that apply to the 320 and 1,090 acre areas have been under contract for over two years. As a considerable amount of time and capital has been invested in pursuing these solar options, we would like to request that the County of Los Angeles take these options into consideration when preparing the Renewable Energy Ordinance. Per discussions with staff, we understand that an internal draft is currently circulating for review; a public release date has not been set. By protecting the future development of utility scale solar power the County and Bolthouse Properties will mutually benefit by implementing the Energy goals and policies in the Draft Antelope Valley Area Plan and encouraging the development of a clean and renewable source of energy.

### **Existing and Proposed Significant Ecological Areas**

It is our understanding that the Antelope Valley Significant Ecological Area, located in the central portion of the Antelope Valley primarily east of the Cities of Palmdale and Lancaster, is proposed to expand significantly. The SEA, "an ecologically important land or water system that supports valuable habitat for plants and animals integral to the preservation of rare, threatened or endangered species and the conservation of biological diversity in the County," is an important land use policy to encourage conservation and species protection in Los Angeles County. Additionally, many areas of this SEA are to

be designated as Ecological Transition Areas (ETAs), represented primarily by large, contiguous agricultural fields and defined as “a subset of a Significant Ecological Area, where the natural ecological features or systems have been degraded as a result of past or on-going land use activities but are deemed functionally integral to the Significant Ecological Area or support important plant or animal populations.”

Bolthouse Properties understands the value of maintaining our natural biological resources and agrees that the current SEA meets several SEA designation criteria and supports many regional biological values. However, we are concerned about the expansion of the Antelope Valley SEA and how it may affect our current and future agricultural, residential, and renewable energy facility development plans for parcels located in or transecting the boundaries of the Proposed SEA. As proposed, the Antelope Valley SEA will include 14 Bolthouse Properties parcels (up from 6), and the proposed ETAs will affect 13 parcels.

The Preliminary Draft Significant Ecological Area and Hillside Management Area Ordinance (available online) outlines the permit requirements and development guidelines. Furthermore, in previous conversations with the County, Bolthouse Properties has been briefed on the purpose and nature of these conservation areas. Nevertheless, we would like to continue our dialogue with the County to improve our understanding of continued development within an SEA and to convey any specific interests to the County as they relate to the expansion of the SEA.

In summation, we appreciate the County’s consideration to

1. Preserve and protect the existing uses of our properties through the proposed RL20 General Plan designation,
2. Protect our existing and future options to develop utility scale solar resources, and
3. Assist us in mitigating the effects of the enlargement of the Antelope Valley SEA on current and future development plans on our properties.

Please do not hesitate to contact me should you have any questions or would like to further discuss.

Sincerely,



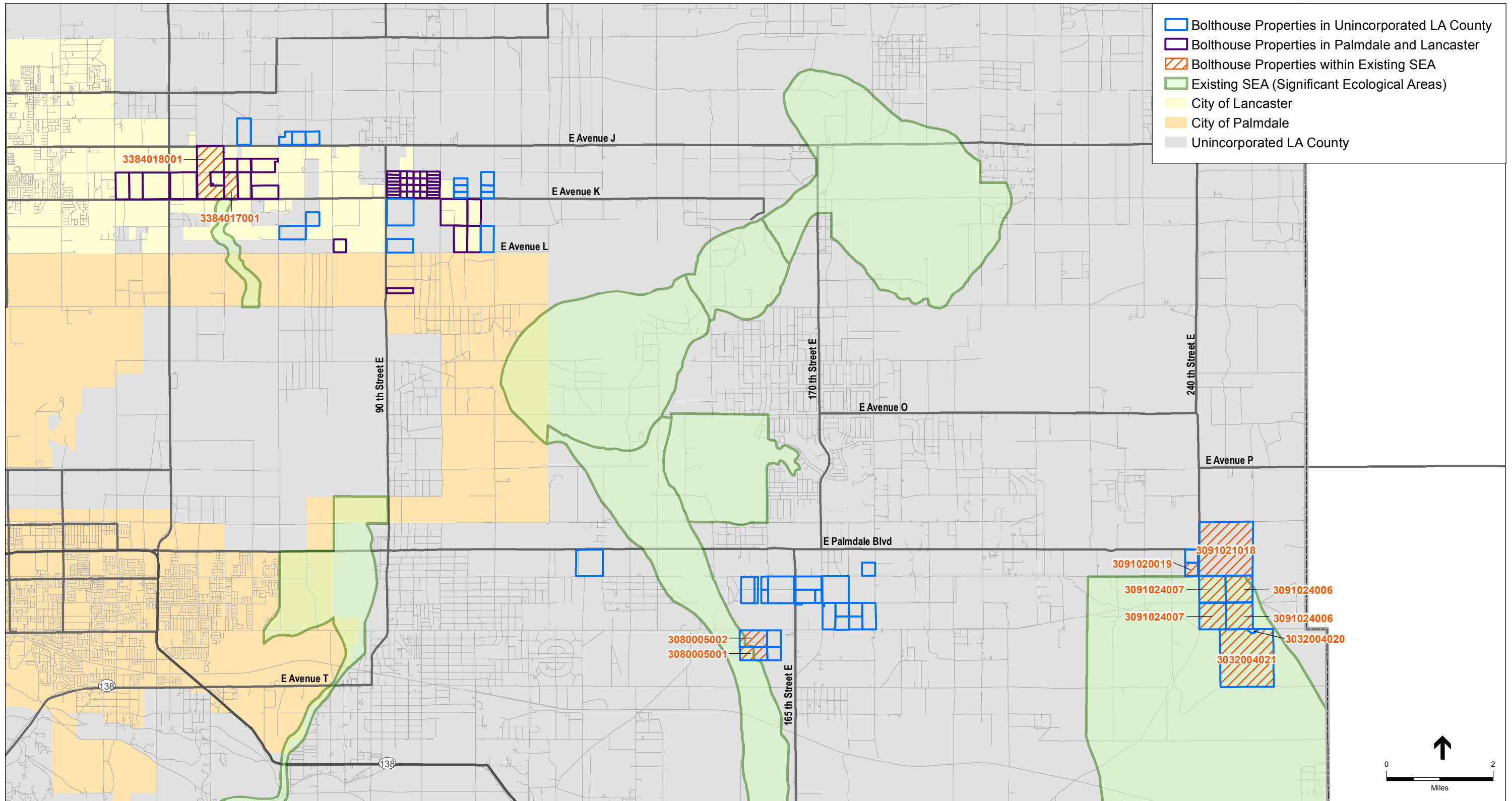
Stephan J. DeBranch

Vice President of Development  
Bolthouse Properties, LLC

CC: Arlene Granadosin, Environmental Science Associates

Attachments:

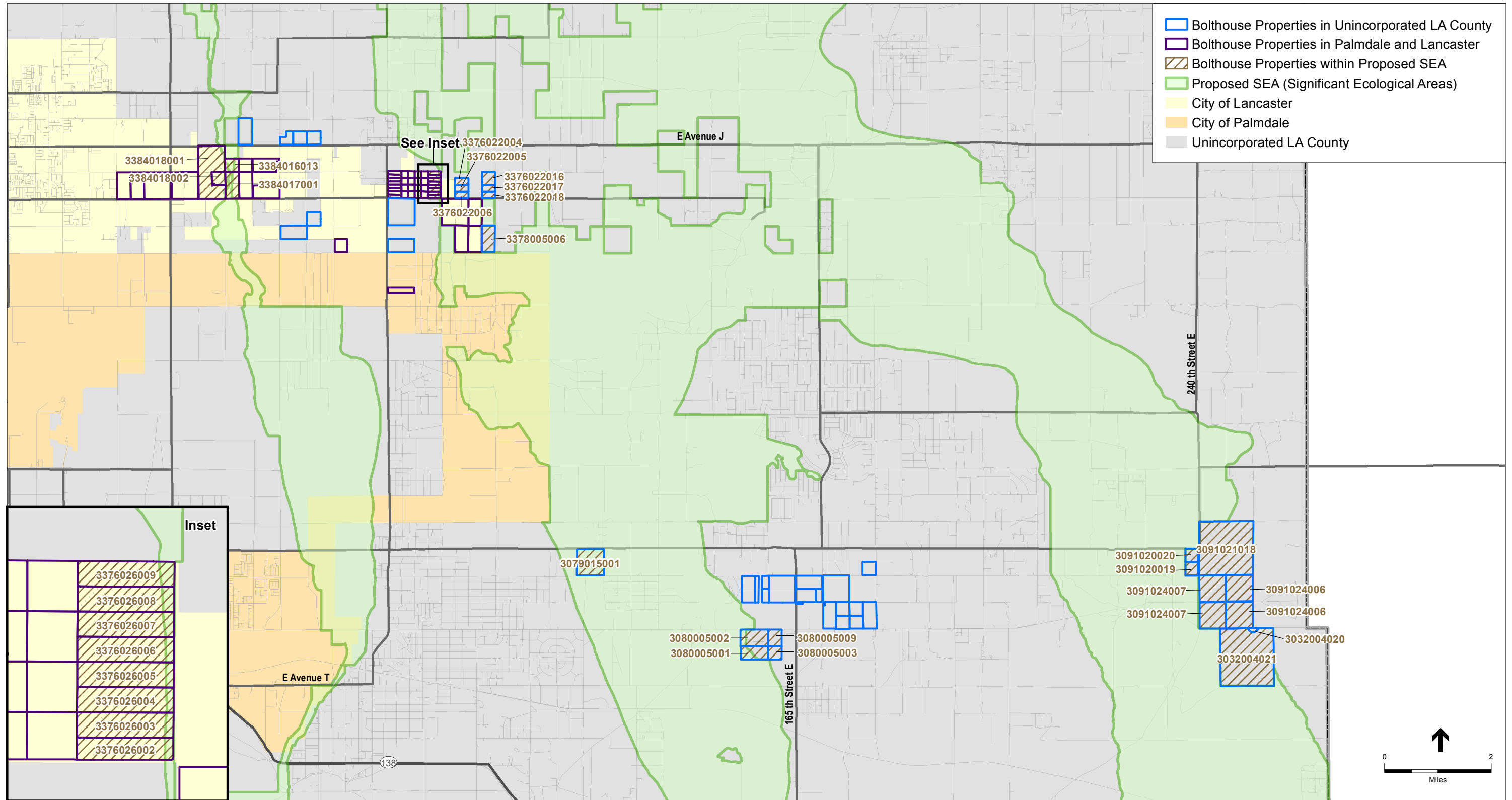
- 1) Exhibit – Bolthouse Properties within Proposed SEA
- 2) Exhibit – Bolthouse Properties within Proposed ETA
- 3) Exhibit – Bolthouse Properties within Existing ETA



SOURCE: LA County GIS; Bolthouse Properties, 2013.

Bolthouse Properties . 120768

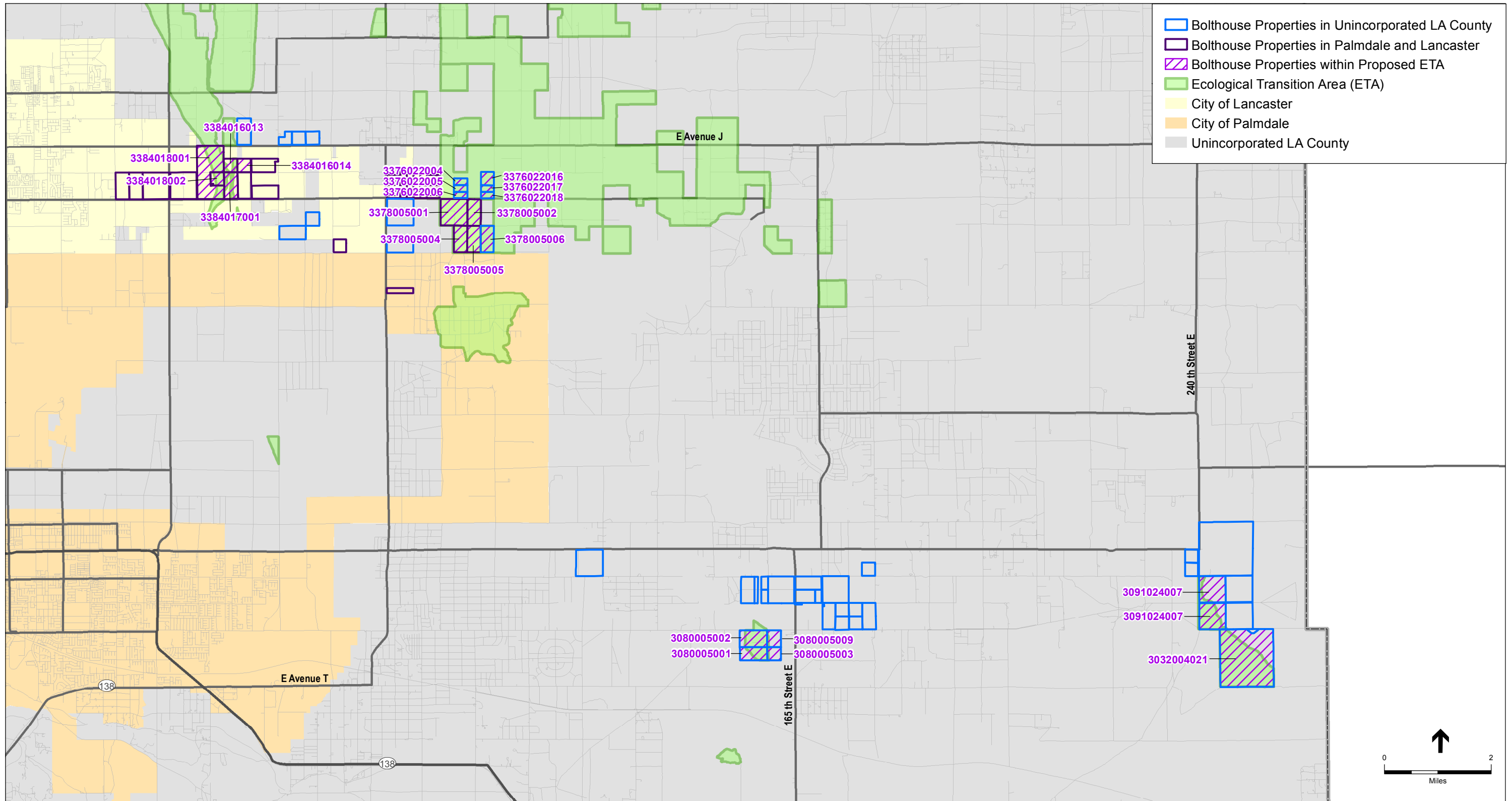
**Figure 1**  
Bolthouse Properties within Existing SEA



SOURCE: LA County GIS; Bolthouse Properties, 2013.

Bolthouse Properties . 120768

**Figure 2**  
Bolthouse Properties within Proposed SEA



SOURCE: LA County GIS; Bolthouse Properties, 2013.

Bolthouse Properties . 120768

**Figure 3**  
Bolthouse Properties within Proposed ETA





[Wales, Macquarie University](#)

**Thesis**

[\*The pipe deposits of tungsten-molybdenum-bismuth in eastern Australia\*](#) (1976)

**Notable awards**

[Eureka Prize](#) (1995, 2002), [Centenary Medal](#) (2003), [Clarke Medal](#) (2004)

## Where Does the Carbon Dioxide Really Come From?

Professor Ian Plimer could not have said it better!

If you've read his book you will agree, this is a good summary.

**PLIMER: "Okay, here's the bombshell. The volcanic eruption in Iceland . Since its first spewing of volcanic ash has, in just FOUR DAYS, NEGATED EVERY SINGLE EFFORT you have made in the past five years to control CO2 emissions on our planet - all of you.**

Of course, you know about this evil carbon dioxide that we are trying to suppress - it's that vital chemical compound that every plant requires to live and grow and to synthesize into oxygen for us humans and all animal life. I know....it's very disheartening to realize that all of the carbon emission savings you have accomplished while suffering the inconvenience and expense of driving Prius hybrids, buying fabric grocery bags, sitting up till midnight to finish your kids "The Green Revolution" science project, throwing out all of your non-green cleaning supplies, using

only two squares of toilet paper, putting a brick in your toilet tank reservoir, selling your SUV and speedboat, vacationing at home instead of abroad, nearly getting hit every day on your bicycle, replacing all of your 50 cent light bulbs with \$10.00 light bulbs.....well, all of those things you have done have all gone down the tubes in just four days.

The volcanic ash emitted into the Earth's atmosphere in just four days - yes, **FOUR DAYS** - by that volcano in Iceland has totally erased every single effort you have made to reduce the evil beast, carbon. And there are around 200 active volcanoes on the planet spewing out this crud at any one time - **EVERY DAY.**

I don't really want to rain on your parade too much, but I should mention that when the volcano Mt Pinatubo erupted in the Philippines in 1991, it spewed out more greenhouse gases into the atmosphere than the entire human race had emitted in all its years on earth.

Yes, folks , Mt Pinatubo was active for over One year - think about it.

Of course, I shouldn't spoil this 'touchy-feely

tree-hugging' moment and mention the effect of solar and cosmic activity and the well-recognized 800-year global heating and cooling cycle, which keeps happening despite our completely insignificant efforts to affect climate change.

And I do wish I had a silver lining to this volcanic ash cloud, but the fact of the matter is that the bush fire season across the western USA and Australia this year alone will negate your efforts to reduce carbon in our world for the next two to three years. And it happens every year.

Just remember that your government just tried to impose a whopping carbon tax on you, on the basis of the bogus 'human-caused' climate-change scenario.

Hey, isn't it interesting how they don't mention '**Global Warming**'

Anymore, but just '**Climate Change**' - you know why?

It's because the planet has COOLED by 0.7 degrees in the past century and these global warming bull artists got caught with their pants down.

And, just keep in mind that you might yet have an Emissions Trading Scheme - that whopping new tax - imposed on you that will achieve absolutely nothing except make you poorer.

**It won't stop any volcanoes from erupting,  
that's for sure.  
But, hey, relax.....give the world a hug and  
have a nice day!"**

July 23, 2013

Comment re Los Angeles County General Plan Update

Dear Ms. Chung & Los Angeles County Regional Planning Department:

Where do you get authority to dictate to others?

Why do you presume wisdom and omniscience - you who cannot spell "Temple" correctly?

Why do you frequently

Los Angeles County  
Regional Planning Department  
320 West Temple Street  
Room 1383  
Los Angeles, CA 90012

revise regulations?

Have you continually improved your god-like ability to order the world, or have you new personnel or budgets to employ?

Do you presume that your wholesale theft of property rights does not constitute a taking?

Organic processes are natural, peaceful, and utilize dispersed local knowledge; top-down forced organization is violent and divisive.

**RECEIVED**  
JUL 25 2013  
BY: \_\_\_\_\_

Sincerely,  
David Berson  
DAVID BERSON  
31550 S. HWY. 1  
GUALALA, CA 95445

## Connie Chung

---

**From:** douglaspfay@aol.com  
**Sent:** Sunday, July 28, 2013 11:34 PM  
**To:** DRP General Plan; executiveoffice@bos.lacounty.gov; jsvensson@dpw.lacounty.gov  
**Subject:** LA County GPU Draft EIR NOP comments by Douglas Fay

Dear Los Angeles County Representatives,

Thank you for the opportunity to participate in the LA County GPU process. I actively participated a decade ago in the Monterey County GPU process and was appointed by the MC Planning Commission to sit on the Ad Hoc Greater Salinas Area Land Use Advisory Committee during the drafting of the vision statement and specific area policies.

I attended a LA County GPU presentation before the Sierra Club by County Staff. Staff eluded to the fact that the current draft is over 900 pages and discourages public participation. They suggested the SC only look at and comment on trails and open space components of the GPU. Does the County have the abilities to make the Draft GPU more user friendly? It needs to be written in a way that makes it as easy as possible for applicants to understand if their proposed project is consistent or not consistent. Does the County have overall guiding objectives?

I watched the video on your website of a previous scoping meeting and observed only 3 public speakers commenting on the GPU process. Your outreach to encourage public participation in the GPU process is inadequate. Why?

I have not read one article online, in the Los Angeles Times Sunday edition, or other local newspapers covering policy language, meeting notices, etc. This is inadequate.

In Monterey County they have Land Use Advisory Committees (LUACs) for all of the areas within the county. Does LA County have LUACs to encourage community access and participation at the local level?

You can sign up for meeting notices and agendas delivered to your inbox. Does the County offer this valuable service to constituents?

I have not seen any GPU community open house meeting notices on the west side/coastal areas. Why?

I have been attending Santa Monica Bay Restoration Commission (SMBRC) Governing Board meetings, of which the County representatives actively participate, and have not witnessed any meaningful discussion on the GPU. Why? Public participation on the LA County GPU through the SMBRC is inadequate.

One of the proposed objectives in their Bay Restoration Plan Update, which I have been denied to actively discuss and participate in, is "1.4 Eliminate all harmful discharges to Areas of Special Biological Significants (ASBS)" with a target date of 2018. The Santa Monica Bay and Pacific Ocean are ASBSs. How does the County plan on fulfilling this objective and meeting this target date?

What is the County's plan on decommissioning Hyperion?

To achieve this objective waste water and urban runoff will need to be treated and recycled by or within the municipalities. Will the County be taking the lead to cease waste water and runoff treatment and recycling segregation?

Will land needed to achieve this goal be identified in the GPU?

Will City/County growth agreement policy language be included in the GPU?

At a recent County sponsored proposed Oxford Basin project presentation that was facilitated by a dozen members of County Staff I submitted a request to be notified of any and all public meetings regarding the Oxford Basin. On the July 16, 2013 Ballona Creek Watershed Task Force meeting Agenda was a "Presentation on Oxford Basin Update - Josh Svensson, Los Angeles County Watershed Management Division." Why wasn't I informed of this presentation?

What policy language is provided in the GPU to protect members of the public from unwarranted exclusion by County staff?

The Oxford Basin is a County dedicated Bird Conservation Area (BCA). What BCA definition and guidelines does the County abide by?

Area BCAs considered ASBSs? If so, when will the County cease the discharges that have significantly compromised the habitat value?

I have read the former and current Marina Del Rey Land Use Plan (MDR LUP). The goals and policy language within the document contains a significant amount of ambiguous wording. How can you comply with CEQA when one policy protects while another policy removes protection?

In summary, being a third generation Los Angeles County resident and activist, I am concerned with the quality of life we will be subjected to under the GPU knowing that many critical areas within the plan have diminished and continue to decline including but not limited to: affordable housing, healthcare & education, traffic congestion, ecology management, smart growth and infrastructure, crime and litter.

The County needs to increase GPU outreach if it is truly to be a sound document. The Housing Element needs to be updated concurrently with the GPU.

I request at this time that I be notified of any and all public GPU meetings and draft documents by email. A free hard copy of the final draft GPU and EIR mailed to my home address, so I may comment on the document language, would be appreciated.

Respectfully submitted,

Douglas Fay  
644 Ashland Ave Apt A  
Santa Monica, CA 90405  
tele: 310 437-0765  
email: [douglaspfay@aol.com](mailto:douglaspfay@aol.com)