



The Regional Planning Commission
The County of Los Angeles County
320 West Temple Street
Los Angeles, CA 90012
Electronic Transmission of five (5) pages to
comment@planning.lacounty.gov

February 21, 2021

Subject: Proposed Revisions to the Acton Community Standards District.

Reference: Project RPPL2018002314

Honorable Commissioners;

The Acton Town Council ("ATC") appreciates the tremendous effort, outreach, and hard work that staff from the Department of Regional Planning ("DRP") have put into the proposed revisions to the Acton Community Standards ("CSD"); the collaboration between Mr. Mark Herwick, Mr. Richard Marshalian, and the residents of Acton has resulted in significant improvements in the CSD for which we are grateful. However, the ATC understands that two issues of critical concern to the community lay outside of DRP's purview and are therefore not addressed within the CSD in a manner which ensures conformance with goals and policies adopted in the County General Plan and the Antelope Valley Area Plan ("Plans"). This is of substantial concern, because the Acton CSD is supposed to be the vehicle that achieves Plan goals and policies adopted for the Community of Acton (see for example AV Area Plan Chapter 8); if critical provisions are omitted from the CSD simply because they are deemed to lay outside of DRP's jurisdiction, then the CSD itself will fail to serve its core purpose because it will not fully implement the Plan goals and policies it is intended to achieve. Moreover, it is the ATC's understanding that all county-approved ordinances, projects, and CSDs must conform to, and be consistent with, adopted Plan policies and goals regardless of what County Department has jurisdiction over their implementation. In other words, the Acton CSD cannot omit or sidestep or ignore "community-critical" provisions that are essential to the implementation of adopted Plan goals and policies simply because their implementation does not rest with DRP. Yet, these are precisely the circumstances presented in the revised Acton CSD. Accordingly, the purpose of this letter is to identify adopted Plan goals and policies that are not achieved by the proposed Acton CSD revisions; it is our hope that this Commission will find a way to rectify these deficiencies. In addition, we present our requested revisions to the Home-Based Occupation provisions.

"Our lives begin to end the day we become silent about things that matter" Martin Luther King, Jr.

Trail Goals and Policies that are not Achieved by the Revised Acton CSD

The AV Area Plan specifies that commercial and industrial developments shall be connected via trails and pedestrian pathways (page COMM 4-5); and it clarifies that commercial developments in Acton is intended to be "local" and "serve community residents" (COMM 3-4) which means that they should be configured to meet the equestrian and pedestrian needs of our community. Additionally, the County General Plan expresses that feeder and connector trails be established regardless of whether they are "mapped" and that County staff will collaborate to establish safe interim connections.¹ These planning policies and goals are supposed to guide development in Acton but they are not incorporated anywhere in the revised Acton CSD and they are certainly not reflected in any of the proposed commercial and industrial developments that are now pending in the Community of Acton and. Mr. Herwick has clarified that trail provisions in the revised Acton CSD were prepared by the Department of Parks and Recreation ("DPR"); notably, nothing in DPR's recommended trail provisions comply with, or even reflect, adopted Plan goals and policies. Furthermore, and based on recent trail decisions that DPR has made on behalf of the Community of Acton, we have concluded that DPR does not make trail decisions based on adopted Plan goals and policies, and instead will only consider a trail if: 1) the trail is "mapped"; 2) the project is discretionary; and 3) DPR staff believe that a trail is warranted. As proof, the ATC can point to a recent project for which DPR opposed a trail simply because it was not "mapped" *even though* the project involved a discretionary subdivision and *even though* we showed how critical the trail was because the "mapped" trail was far too dangerous to use² We can also point to a recent project for which DPR refused to secure a trail simply because staff did not consider it warranted *even though* the project was a discretionary subdivision and *even though* the trail was "mapped". We can also point to commercial projects for which DPR did not secure a trail *even though* the trail was "mapped". We have tried to discuss these issues and resolve them well in advance of the pending Planning Commission hearing on the revised CSD, but DPR has not responded to our communications and will not engage with us. Though we have been unable to discuss these issues with DPR staff, we have been told that DPR staff do not believe that trail dedications can be secured on ministerial projects; if so, then we believe DPR is mistaken. The Department of Public Works ("DPW") obtains roadway dedications from ministerial projects all the time; and we seen no reason why DPR cannot similarly secure trail dedications *especially if the trail does not alter the project* because it occupies an area that would be landscaped anyway. In other words, the ATC is not aware of any valid reason why the revised Acton CSD fails to properly address trails in a manner that fully achieves all adopted trail goals and policies that are set forth in both the County General Plan and the Antelope Valley Area Plan. And, until the revised Acton CSD is brought into conformance with adopted trail goals and policies, the ATC must remain opposed to it.

¹ Plan goals and policies are summarized on pages 19-20 of Exhibit H – Public Correspondence.

² The dangerous situation is described on page 20 of Exhibit H – Public Correspondence.

Low-Intensity, Local-Serving Commercial Uses are Secured by the Revised Acton CSD

The AV Area Plan specifies that the commercial land use designation in Acton is intended to allow low-intensity local commercial uses that serve community residents, and it strongly discourages any new development that would require the installation of urban infrastructure such as concrete facilities or traffic signals because it does not fit with Acton's unique rural character and identity³. Additionally, the adopted County General Plan establishes that the purpose of the Rural Commercial land use is to allow "limited, low intensity commercial uses that are compatible with rural and agricultural activities" and it defines "Rural" as a way of life characterized by living without typical urban infrastructure⁴. The ATC is concerned that the revised Acton CSD does not incorporate provisions which even address these community-critical Plan goals and policies, let alone ensure that they are implemented. For instance, the ATC has repeatedly asked for Acton CSD language which asserts that commercial development must be "local serving" (a term used in the Santa Monica Mountains North Area CSD) but that request was rejected. We have also asked that the revised Acton CSD include language to preclude commercial and industrial development which warrants traffic signalization or requires extensive concrete drainage facilities, but these requests have also been rejected because such matters fall under the purview of the Department of Public Works ("DPW"). This poses a problem because all aspects of a project must conform with adopted Plan goals and policies regardless of whether some elements fall under DPW's jurisdiction while other elements fall under DRP's jurisdiction. Moreover, the ATC notes with alarm that, for at least the last 15 years, the DPW has *never* required any commercial or industrial developments in Acton to conduct a "traffic signal warrant analysis"! This means that, for at least 15 years, the County has habitually failed to determine whether commercial or industrial developments in Acton warrant traffic signalization and, by extension, whether they are consistent with adopted Plan goals and policies. *This untenable situation continues to this day*; the ATC was recently informed that DPW is not requiring a traffic study/warrant analysis for a new, large, commercial development in Acton that is projected to generate 1,500 or more vehicle trips per day . For several months now, the ATC has tried to discuss this with DPW staff, but DPW will not engage with us. The last communication received from DPW was on December 23; in response to our request for an opportunity to confer about the project, we were told "we will take your request into consideration". Given these circumstances, and given DPW's ongoing reluctance to implement even the most basic measures necessary to ascertain whether commercial development in Acton complies with "community critical" goals and policies, the ATC has no choice but to oppose the revised Acton CSD until it incorporates the measures that are necessary and sufficient to ensure these critical goals and policies are achieved.

³ See Page COMM-4.

⁴ See Pages 74 and 80.

Requested Revisions to Home-Based Occupation Provisions of the Revised Acton CSD.

The ATC appreciates the revisions to the Home-Based Occupation provisions that DRP has included in the revised Acton CSD; however, we note that they are still firmly rooted in Section 22.140.290 of the County code. This is a problem because Section 22.140.290 was developed based on an urban residential perspective and is therefore intrinsically too restrictive to accommodate the type of home-based businesses that can thrive in rural, agricultural areas without adversely impacting neighboring properties. We know this for a fact, because rural residents already operate businesses from their homes that do not strictly comply with Section 22.140.290, but they do so without bothering their neighbors. For instance, sculpture artists and custom furniture builders who live on large parcels and operate mechanical equipment do so without causing adverse noise impacts on their neighbors even though the equipment does not comply with 22.140.290(C)(9). Acton also has furniture upholsterers who operate out of their homes without bothering their neighbors. The ATC seeks to bring these home-based businesses out of the shadows and allow them to operate without fear. Furthermore, we have not heard any substantive reasons which justify a prohibition on small beautician or aesthetician shops in Acton; in fact, the first home-based business that was ever legally established in the County of Los Angeles was in Acton, and it was a hair salon!

The ATC understands that DRP may be concerned that our requested revisions could result in the development of large-scale business enterprises, but we point out that the scale of home-based businesses in Acton will be limited by the impervious surface restrictions that are already in the Acton CSD as well as existing constraints on the size of accessory buildings. We also point out that Title 10 noise restrictions will still apply at the property boundary, so we do not see why there would be objections to our requested revisions.

The Acton Town Council has always supported the robust development of home-based business opportunities in Acton; in fact, the Acton CSD was the County's first zoning ordinance to allow home-based occupations to exist. The Community of Acton has pioneered home based business opportunities, and the ATC seeks to continue this work. Home based businesses should be supported for a number of reasons, not the least of which is that they reduce vehicle dependencies and greenhouse gas emissions. We recognize that business practices are changing, so we must ensure that our CSD includes home based business provisions that will be capable of keeping up with these changes over the next 25 years (since the Acton CSD appears to have a 25-year update/revision cycle). Also, facilitating home-based business opportunities makes our community more resilient and better able to withstand large scale events such as pandemics, floods, earthquakes and other disasters.

For all these reasons, the Acton Town Council respectfully requests that the revised CSD incorporates the following elements:

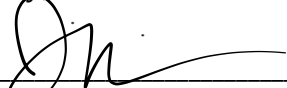
- 22.140.290(C)(9) does not apply to properties that are at least 2 acres in size, but the use must still comply with Chapter 12.08 (Noise Ordinance) at the property line.
- Furniture upholstery services are permitted.
- Machine shops are permitted on properties that are at least 2 acres in size, but the use must still comply with Chapter 12.08 (Noise Ordinance) at the property line.
- Beautician/Aesthetician services are permitted.

Conclusion.

Over the last 2+ years, the Department of Regional Planning has collaborated extensively with the ATC and the residents of Acton to develop revised CSD provisions that reflect our Community vision, and we greatly appreciate those efforts. It is our hope that DPW and DRP will agree to work with us to address the concerns identified above in a manner that will soon allow us to give our full support to the revised Acton CSD. It is also our hope that the Commission will agree with our Home-Based Occupation recommendations and incorporate them in the revised Acton CSD. There are a few more outstanding issues⁵, however we are optimistic that they can be quickly and easily addressed by some additional coordination with DRP.

Thank you for your time and consideration.

Sincerely;



Jeremiah Owen, President
Acton Town Council

cc: The Honorable 5th District Supervisor Kathryn Barger [kathryn@bos.lacounty.gov]
Anish Saraiya, Planning and Public Works Deputy [ASaraiya@bos.lacounty.gov]
Mark Herwick, Department of Regional Planning [mherwick@planning.lacounty.gov]
Richard Marshalian, Department of Regional Planning [RMarshalian@planning.lacounty.gov]

⁵ The ATC has requested that provisions addressing non-conforming signs be included in the revised Acton CSD; the language we are requesting is identical to that which is included in zoning provisions applicable to East Los Angeles, therefore it seems reasonable. We have also requested that outdoor storage uses on industrially zoned property be subject to a minor CUP to address ongoing concerns with such uses that already exist in Acton and pertain to things such as operating hours, circulation, etc.



February 17, 2021

Mr. Richard Marshalian
Senior Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, California, 90012
Electronic transmission of nine (9) pages to:
RMarshalian@planning.lacounty.gov

Subject: Comments from the Acton Town Council on the Public Comments Posted in Response to the Draft Acton Community Standards District Zoning Revision.

Reference: Exhibit H Public Comments posted here:
<https://planning.lacounty.gov/site/avcsd/documents-and-reports/>

Dear Mr. Marshalian;

Over the last 3 years, the Acton Town Council has sought to ensure that the Acton Community Standards District revisions which the Department of Regional Planning has initiated will reflect the community's wishes (as they have been expressed to us in all our outreach efforts) and achieve the community's goals and policies that were adopted in the "Town and Country" AV Area Plan in 2015. Though our efforts on the County's CSD revision process have touched on many topics; our recent focus has been on expanding home-based business opportunities to the extent that they do not disrupt surrounding neighbors and securing equestrian trails on proposed developments. Also, we understand that there is a County-wide restriction on the number of containers that can be placed on a parcel; we are seeking to allow more containers on parcels in Acton if they meet certain screening and aesthetic requirements. It is important to note that many of the items which we have supported and requested (particularly regarding trail development and filming opportunities) have been rejected by the County and omitted from the current draft of the CSD which is cause for concern.

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The Department of Regional Planning recently posted all the comments that it has received on the Draft Acton CSD, and the Acton Town Council has gone through them carefully; it seems that there are a few individuals who have raised issues regarding the comments that the Acton Town Council has gathered from community members and submitted to you for inclusion in the revised CSD. To ensure absolute transparency and gather the greatest amount of community input on the proposed Acton CSD revisions before the Planning Commission hearing on the 24th, the Acton Town Council has summarized these public comments below and we offer our perspective on them; we are also asking Acton residents to share their thoughts on the issues expressed below by sending an email to atc@actontowncouncil.org.

Mr. Kenneth Chang from Coast International LLC would like to construct a "strip mall" on a 3-acre parcel located at the intersection of Crown Valley Road and Governor Mine Road/Bandell. The development could have a grocery store, a coffee shop, doctor/professional offices, and a post office/mailbox on the ground floor and residential space on the second floor. The Acton Town Council's perspective on this proposal is that it would require a General Plan Amendment and an AV Area Plan Amendment, a revision to the County's adopted Land Use Map, and a zone change action. These substantial changes could only be initiated if a significant majority of Acton residents wish them; accordingly, we are asking residents to let us know what they think about this proposal by sending an email to atc@actontowncouncil.org. In any event, it is doubtful that Mr. Chang's suggestion could be implemented as part of the Acton CSD revision.

Ms. Patti Duce from the Community of Agua Dulce has asked that Acton be made a film friendly community. The Acton Town Council supports filming activities that do not create explosions or other loud noises or include disruptive lighting or cause traffic jams or damage our local (dirt) roads or result in excessive use of individual locations. However, the Department of Regional Planning is not permitting any filming provisions in the Acton CSD.

Ms. Debbie Scantlin and Mr. Mark Scantlin have stated that they support filming in Acton. The Acton Town Council has always supported filming activities that do not create loud noises, disruptive lighting, or traffic jams or damage local roads or use individual locations excessively. However, the Department of Regional Planning is not permitting any filming provisions in the Acton CSD.

Ms. Amanda Violet Hayes - states that, regarding filming, Jacki Ayer and Chris Croisdale are bullies with personal vendettas and are trying to satisfy these vendettas by using the county as a vehicle. No specific information was provided regarding the vendettas that are alleged, so the Acton Town Council is unable to provide a substantive response other than to point out that we have always supported filming activities that do not create loud noises, disruptive lighting, or traffic jams or damage local roads or use individual locations excessively. However, the Department of Regional Planning is not permitting any filming provisions in the Acton CSD.

Deven Chierighino - states that he understands community concerns regarding "filming standards" but not the restrictions that have been proposed. He would like the opportunity to discuss this as a member of the filming community and bring a property owner's perspective to come to an amicable change. The Acton Town Council's perspective is one which welcomes ideas on how to accommodate the needs of the filming industry without intruding on the rural protection provisions secured for the Community of Acton by the County General Plan and the AV Area Plan. Based on community input, we have balanced these interests by supported filming activities that do not create loud noises, disruptive lighting, or traffic jams or damage local roads or use individual locations excessively. We would appreciate any recommendations that Mr. Chierighino can provide that will enhance this balance, and ask that they be sent to atc@actontowncouncil.org. However, any dialogue on this issue must be conducted outside of the CSD revision process because the Department of Regional Planning is not permitting any filming provisions in the Acton CSD.

Mr. Gary Luben states that Acton is a Transportation Corridor and that not allowing drive-throughs is archaic, inconsistent with modern life, and narrow minded. He further states that, because Acton is a Transportation Corridor with visibility from the freeway, we need to embrace the opportunity to provide profit-based businesses that generate tax revenue and that a good use of tax dollars would be to build a "brick & mortar" high school and get rid of the existing prison-like school. He indicates that it is only a minority that believe freeway-serving businesses should be discouraged, and he expresses concern that the community is divided by a rust belt of storage and other non-tax revenue producing activities along Sierra Highway. The Acton Town Council offers the following perspectives on Mr. Luben's concerns: First, the "Acton Takes Action" Coalition has put a tremendous amount of work into bringing the industrially zoned storage facilities along Sierra Highway into compliance with landscaping and fencing requirements, and the Council supported their efforts to the greatest extent possible; "Acton Takes Action" pushed County enforcement staff as hard as they could, and a great many improvements were made, however it seems that Mr. Luben remains dissatisfied. Any recommendations that he can make to try to get the County to bring these facilities into compliance would be greatly appreciated. Regarding the suggestion that Acton become a freeway serving commercial corridor with multiple drive-through businesses to increase tax revenue, it is likely that this would require a General Plan Amendment and an AV Area Plan Amendment, a revision to the County's adopted Land Use Map, and many zone-change actions. These substantial changes could only be initiated if a significant majority of Acton residents wish them; accordingly, we ask residents to let us know what they think about this proposal by sending an email to atc@actontowncouncil.org. It must be noted that any tax revenue generated by converting Acton into a freeway serving commercial corridor would not fund any school construction activities or go directly into the community. Instead, it would go to the County and be used in any way that the Board of Supervisors sees fit. Given the scope and scale of Mr. Luben's recommendations, it is doubtful that the Department of Regional Planning would be able to implement them as part of the Acton CSD revision process.

P. Westrop – Regional Planning Summary Notes indicate that P. Westrop does not like the design standards for industrial or commercial property. The Acton Town Council's perspective is that Acton's architectural standards have been in place since 1995, and no changes have been recommended during the CSD revision process. This is the first time that the Acton Town Council has heard objections to the Acton CSD Architectural Standards, and we welcome the opportunity to address them; however, to do so, we would require specific information regarding the requested changes. Accordingly, it would be greatly appreciated if P. Westrop would email us at atc@actontowncouncil.org and provide further information regarding the Architectural Standards revisions that he recommends.

T. Westrop – Regional Planning Summary Notes indicate that T. Westrop opposes restrictions on shipping containers and expressed that parking placement requirements will not allow businesses to properly operate. The Acton Town Council's perspective on this is that we are trying to reduce restrictions on containers in Acton by asking for an increase in the number permitted, but input from residents indicates that they wish the containers to be screened or at least aesthetically pleasing, so that is the balance that we are attempting to strike. Also, we are unable to conceive of how parking placement requirements will interfere with business operation; if T. Westrop could provide additional information regarding this concern, we will try to incorporate it in our comments.

Evalyn - Regional Planning Summary Notes indicate that Evalyn wants more housing development. The Acton Town Council's perspective is that we welcome residential development that complies with the standards set forth in the AV Area Plan and the CSD.

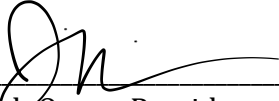
Michael Fahnestock - states that he would like the setback that requires livestock structures from human inhabited structures to be reduced from 50 feet to less than 35 feet. It is the Acton Town Council's understanding that the livestock setback restriction is not in the Acton CSD; rather it is elsewhere in the code and that it is motivated by health and safety concerns. We welcome the opportunity to discuss this idea with Mr. Fahnestock, but since it is a matter that is addressed outside of the Acton CSD, it seems unlikely that the Department of Regional Planning would address it in the Acton CSD revision process.

P. Lawson - Regional Planning Summary Notes indicate that P. Lawson wants an exception to the vegetation protections for single family residences. The Acton Town Council thought this request was accommodated by asking Regional Planning to exempt certain uses (such as equestrian uses) from the vegetation protection provisions. If this is not sufficient, then it would be helpful for P. Lawson to provide additional information regarding additional uses for inclusion in the list of exemptions by emailing us at atc@actontowncouncil.org.

J. Kestler - Regional Planning Summary Notes indicate J. Kestler requests that trails be protected and expanded and that, because of limited water resources, Acton should have planned, limited growth. The Acton Town Council's perspective is one of agreement; we support growth that complies with adopted land use regulations and have endeavored to expand trail provisions in the Acton CSD. Unfortunately, it appears that the Department of Regional Planning is rejecting our requested changes to the CSD trail provisions.

If you have any questions or require further information, please do not hesitate to contact us at atc@actontowncouncil.org. A copy of this letter will be distributed to local papers and posted on our website.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Owen', written over a horizontal line.

Jeremiah Owen, President
The Acton Town Council



Jeff Pletyak, P.E.
Senior Civil Engineer
Los Angeles County Department of Public Works
Electronic Transmission of two (2) pages to
JPLETY@dpw.lacounty.gov

February 20, 2021

Subject: Low-Intensity, Local Serving Commercial Development in Acton

Reference: Proposed Revisions to the Acton Community Standards District
Project RPPL2018002314

Dear Mr. Pletyak;

More than two months have passed since the Acton Town Council ("ATC") last heard from the Department of Public Works ("DPW") regarding concerns that we raised with proposed commercial developments in Acton. And now, the Community of Acton finds itself on the threshold of change because the County is proceeding with a Planning Commission Hearing on proposed revisions to the Acton Community Standards District ("CSD") that is scheduled for next week (February 24, 2021). The Acton Town Council is concerned that the CSD does not appear to reflect the policies and goals set forth in the County General Plan and the Antelope Valley Area Plan; in particular, we are concerned that the proposed CSD revisions will not achieve the low-intensity, local-serving commercial development objectives that were established for Acton during the General Plan update and AV Area Plan update process in 2014 and 2015. We have been informed by staff from the Department of Regional Planning ("DRP") that their proposed revision to the Acton CSD does not include language which requires commercial development to be either low-intensity or local-serving (even though such language is specified in both the County General Plan and the AV Area Plan). We were also informed that the one method available for assessing whether a commercial project is low-intensity or local-serving is to consider the traffic that the project will generate. Since traffic issues fall within the purview of DPW, we are now compelled to consider the extent to which DPW's project review process reveals whether a commercial development is indeed low-intensity and local serving. Accordingly, we have taken a very close look at the process DPW initiated to review the proposed Dollar General project, and we are concerned that it is not sufficient to establish whether commercial development in Acton will achieve adopted plan goals and policies by being low-intensity and local-serving.

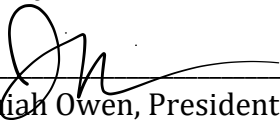
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Specifically, we understood from an email that we received in September, 2020 that DPW does not intend to conduct any sort of traffic study for the Dollar General project; this caused great concern because traffic studies are essential for evaluating both the intensity of a project and whether traffic signals are warranted. Moreover, the Rural Commercial Zoning Ordinance imposes a Conditional Use Permit requirement on ministerial projects that warrant traffic signalization. Accordingly, if DPW does not impose a traffic study requirement on commercial developments which (like Dollar General) result in many hundreds or even more than a thousand vehicle trips per day, then the County cannot affirm that such projects comply with the rural commercial zoning code or conform with adopted plan goals and policies. This is a substantial deficiency, particularly since DPW bears a burden equal to that borne by DRP to ensure that all projects in Acton conform with adopted plan goals and policies.

The ATC has expressed the concerns identified above to DPW staff numerous times during the Fall of 2020, and in December, we were told that DPW was going to meet with us to discuss these issues and (hopefully) work with us on a path forward. Since then, we have heard nothing and now, on the eve of our CSD hearing, we remain in the dark regarding how commercial development will be reviewed after the CSD is adopted to ensure consistency with adopted plans goals and policies. This puts the ATC in a very difficult position, particularly given that the CSD hearing is only days away. So, now, we must ask: Does DPW have any intention of engaging with the ATC on the matter of commercial development in Acton? If so, when? If not, why not?

Thank you in advance for your time and attention.

Sincerely;



Jeremiah Owen, President
Acton Town Council

cc: The Regional Planning Commission [comment@planning.lacounty.gov]
Mark Herwick, Department of Regional Planning [mherwick@planning.lacounty.gov]
Richard Marshalian, Department of Regional Planning [RMarshalian@planning.lacounty.gov]



Director Garcia-Gonzalez
Department of Parks and Recreation
County of Los Angeles
info@parks.lacounty.gov

February 19, 2021

Subject: Acton Community Standards District Revisions and Trail Exactments on Commercial and Industrial Development in Acton.

Reference: RPPL2018002314

Honorable Director Garcia-Gonzalez;

I apologize for the informal manner in which this letter is addressed; I was unable to find either an email address or a mailing address on the Parks and Recreation website. And, when I called the phone number listed on the Parks and Recreation website, the only option available was to leave a recorded message; I did not do so because the concerns raised herein are too important to be relegated to a voice mail message.

The Community of Acton finds itself on the threshold of change; the County is proceeding with proposed revisions to the Acton Community Standards District ("CSD") that are scheduled for a Planning Commission hearing next week (February 24, 2021). The Acton Town Council is concerned that the CSD does not appear to reflect the policies and goals set forth in the County General Plan and the Antelope Valley Area Plan; in particular, we are concerned that the proposed CSD revisions do not achieve or address the trail policies or local serving development objectives that were secured for Acton during the General Plan update and AV Area Plan update process in 2014 and 2015. To support this contention, we point to recently proposed commercial and industrial projects in Acton that we have evaluated through the lens of the County's proposed CSD revisions and found that they fall very short of adopted County General Plan and the AV Area Plan goals and policies.

Specifically, the AV Plan clarifies that commercial development in Acton be local-serving, and it specifies that commercial and industrial developments be connected via trails and pedestrian pathways. Additionally, the County General Plan expresses that feeder and


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connector trails be established regardless of whether they are "mapped". These planning policies and goals are supposed to guide development in Acton but they are not being considered in any of the commercial and industrial developments proposed for Acton and they are certainly not incorporated anywhere in the County's revised CSD. The ATC has been informed by the Department of Regional Planning ("DRP") that the Department of Parks and Recreation ("DPR") prepared the proposed CSD language addressing trails; the ATC was also informed that we must consult DPR to address our trail concerns, but DPR staff will not engage with us on the issue. In early November, we participated in what is best described as a "listening" session with DPR staff, but there was never any followup and since then, DPR staff have not communicated with us or responded to our meeting request. It was the ATC's understanding that DPR's activities must be consistent with, and actively achieve, General Plan and AV Area Plan goals and policies, but given the trail language that DPR developed for the proposed CSD and given the recent trail decisions that DPR has made regarding proposed commercial and industrial development in Acton, we must now conclude otherwise.

The lack of communication from DPR over the last few months has put the ATC in a very difficult position, particularly given that the CSD hearing is only days away. We have residents asking why the trail provisions in the revised CSD are so untenable, and we can't answer them. We have residents asking us why none of the proposed commercial and industrial developments are configured with trails to make them local-serving and comply with the AV Plan, and we can't answer them. So now, we must ask DPR: are we correct in our understanding that DPR does not intend to engage with the ATC on the matter of trails in Acton? If so, why? If not, kindly explain what it is that we must do to initiate some sort of dialogue with DPR staff.

Thank you in advance for your time and attention.

Sincerely;



Jeremiah Owen, President
Acton Town Council

cc: The Honorable 5th District Supervisor Kathryn Barger [kathryn@bos.lacounty.gov]
The Regional Planning Commission [comment@planning.lacounty.gov]
Mark Herwick, Department of Regional Planning [mherwick@planning.lacounty.gov]
Richard Marshalian, Department of Regional Planning [RMarshalian@planning.lacounty.gov]

From: [Acton Town Council](#)
To: [Richard Marshalian](#); [Acton Town Council](#); [Termeer, Donna](#); [Bostwick, Charles](#)
Cc: [Mark Herwick](#)
Subject: Re: Projects proposed in Acton
Date: Monday, February 22, 2021 10:42:23 AM

CAUTION: External Email. Proceed Responsibly.

From what DRP has indicated over the last month or twp, DPW controls the critical mechanisms that will secure the type of low intensity, local serving businesses that are called for in the AV Plan, and we have observed from DPW review of Dollar General that DPW does not use those mechanisms. So, I believe those emails are relevant to the CSD even though they target the Dollar General. Given that, it is probably a good idea to include them perhaps with this email to give them context.

Also, the emails sent this weekend (one to DPW, one to DPR) should probably go in the record too..... it is important that the RPC see that we really have tried to address concerns that lay outside of DRP's purview.

Thank you for asking
Jacqueline Ayer
Correspondence Secretary

On Mon, Feb 22, 2021 at 9:05 AM Richard Marshalian
<RMarshalian@planning.lacounty.gov> wrote:

Thank you Jacki,

I've been going over your emails. Did you want me to include the correspondences you had with PW in the public record as a comment on the CSD, or was this solely to respond to our request and discussion during the meeting. I want to make sure I don't overstep in posting the emails.

Sincerely,

Richard

Richard Marshalian | County of Los Angeles, Department of Regional Planning

Email: RMarshalian@planning.lacounty.gov

Office: 213.974.6476

In response to the evolving coronavirus emergency, Los Angeles County facilities are closed to the public at this time. For the most current information about available services, public meeting schedules, and planning projects, please visit planning.lacounty.gov

From: Acton Town Council <atc@actontowncouncil.org>
Sent: Thursday, February 18, 2021 9:27 AM
To: Richard Marshalian <RMarshalian@planning.lacounty.gov>; Mark Herwick <mherwick@planning.lacounty.gov>; Termeer, Donna <DTermeer@bos.lacounty.gov>; Bostwick, Charles <CBostwick@bos.lacounty.gov>; Acton Town Council <atc@actontowncouncil.org>
Subject: Fwd: Projects proposed in Acton

CAUTION: External Email. Proceed Responsibly.

Per your request from last night - Here is the email from DRP that DPW's Traffic and Lighting section will not be reviewing the Dollar General project. Without a traffic study, it is not possible to conduct a traffic signal warrant analysis. Without a traffic signal warrant analysis, it is not possible to determine whether traffic signals are warranted and a CUP is required pursuant to 22.24.030.D

I will send our followup email next....

----- Forwarded message -----

From: **Christina Carlon** <ccarlon@planning.lacounty.gov>
Date: Mon, Sep 14, 2020 at 12:34 PM
Subject: RE: Projects proposed in Acton
To: Acton Town Council <atc@actontowncouncil.org>
Cc: Susan Tae <stae@planning.lacounty.gov>, Carmen Sainz <csainz@planning.lacounty.gov>, Edward Rojas <erojas@planning.lacounty.gov>

Hello –

Sure, please see updates here:

BBQ restaurant, the Car Dealership, I am not familiar with these, but have copied Supervisorial staff who may know about these projects.

the Dollar General, Public Works Land Development has determined traffic lighting will not be needed. Therefore the project will continue to be processed ministerially. The project was reviewed by our design review committee late last month, and the DG architects are working on incorporating several design upgrades I suggested to them after that meeting. Of course once I have those I will forward to you for your

input

the Kipp Construction development, etc [this one is the one I recently sent you for your input, it is ready for approval here at Regional Planning – after years of the applicant tweaking and improving the plans.](#)

Hope this helps!

Christina (Tina) Carlon

Senior Planner, Antelope Valley Field Office

L.A. County Dept. of Regional Planning

ccarlon@planning.lacounty.gov

Have you tried our EPICLA electronic permitting website? **We Appreciate Your Feedback!**

Please take a moment and fill out our EPIC-LA customer experience survey by clicking on the link below:

<https://bit.ly/LACoCSSSurvey>

In response to the evolving coronavirus emergency, Los Angeles County facilities are closed to the public at this time. I will be working from home and will still try to answer your emails, and process plans, as quickly as possible using the equipment available to me. For the most current information about our available services, please visit planning.lacounty.gov

CONFIDENTIALITY NOTICE: This email message, including any attachments, from the Department of Regional Planning is intended for the official and confidential use of the recipients to whom it is addressed. It contains information that may be confidential, privileged, work product, or otherwise exempted from disclosure under applicable law. If you have received this message in error, be advised that any review, disclosure, use, dissemination, distribution, or reproduction of this message or its contents is strictly prohibited. Please notify us immediately by reply email that you have received this message in error, and destroy this message, including any attachments.

From: Acton Town Council <atc@actontowncouncil.org>
Sent: Monday, September 14, 2020 11:12 AM
To: Christina Carlon <ccarlon@planning.lacounty.gov>; Acton Town Council <atc@actontowncouncil.org>
Subject: Projects proposed in Acton

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Carlon;

The ATC is participating in a public event this afternoon that will solicit input from Acton residents on important issues facing the community, including the new ordinance that allows people to live in RVs on residential properties, the climate vulnerability assessment, etc. I would like to provide them with an update on several proposed projects in the community, including the BBQ restaurant, the Car Dealership, the Dollar General, the Kipp Construction development, etc. Is it possible to get an update from you on these or any other projects that are going on in town of which you are aware? Any information that you can provide would be greatly appreciated it; thank you in advance for your time.

Sincerely

Jacqueline Ayer

Correspondence Secretary

From: [Acton Town Council](#)
To: [Richard Marshalian](#); [Mark Herwick](#); [Termeer, Donna](#); [Bostwick, Charles](#); [Acton Town Council](#)
Subject: Fwd: FW: traffic study for Dollar General
Date: Thursday, February 18, 2021 9:52:31 AM

CAUTION: External Email. Proceed Responsibly.

This was our response trying to still salvage an early meeting

----- Forwarded message -----

From: Acton Town Council <atc@actontowncouncil.org>
Date: Wed, Dec 23, 2020 at 8:48 AM
Subject: Re: FW: traffic study for Dollar General
To: Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov>
Cc: Saraiya, Anish <ASaraiya@bos.lacounty.gov>, David MacGregor <DMACGREG@dpw.lacounty.gov>, Emiko Thompson <ETHOMP@dpw.lacounty.gov>, Jeff Pletyak <JPLETY@dpw.lacounty.gov>, Acton Town Council <atc@actontowncouncil.org>

Dear Mr Ibrahim;

Thank you for your email. It sounds like Traffic & Lighting will confer with the ATC *after* County staff meet and discuss the project; we had hoped that we could have an advanced discussion with T & L regarding the new Transportation Impact Analysis Guidelines by using it as a lense to look at the Dollar General Project. We had also hoped that we would be permitted to share our thoughts on the project with T&L *before* "the County meets on this project" so that our comments and concerns could be factored into the discussion that T&L and other County staff will have about this project. However, from your email, it sounds like both of these hopes are dashed. I am concerned that a discussion between the ATC and T&L after the fact will be little more than a post-hoc clarification of a decision already made rather than the thoughtful discussion of issues that we had hoped for. But at this point, we will take whatever we can get. However , please let me know if there is any way that we could possibly confer with T&L *before* "the County meets on this project"

Sincerely
Jacqueline Ayer
Planning Committee Chairperson

On Tue, Dec 22, 2020 at 5:15 PM Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov> wrote:

Good afternoon Ms. Ayer

Sorry for the Delay, but it will be a couple more weeks before the County meets on this project. We will get back to when we have additional information for you. Thank you.

Amir S. Ibrahim, P.E., L.S.
Principal Engineer
Los Angeles County Public Works
Office: (626) 300-4713

From: Jeff Pletyak
Sent: Tuesday, December 15, 2020 4:58 PM
To: Acton Town Council <atc@actontowncouncil.org>
Cc: Anish Saraiya <ASARAIYA@dpw.lacounty.gov>; David MacGregor <DMACGREG@dpw.lacounty.gov>; Emiko Thompson <ETHOMP@dpw.lacounty.gov>; Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov>
Subject: RE: FW: traffic study for Dollar General

Good afternoon Ms. Ayer

We are currently coordinating the meeting availability with the representatives from the Department of Regional Planning.

To assist in coordinating the various schedules, we will send an email to all meeting attendees with a Doodle poll to survey everyone's meeting availability. Upon completion of the Doodle poll, we will confirm the meeting schedule date and time with you and the Acton Town Council.

Jeffrey Pletyak, P.E.
Senior Civil Engineer
Los Angeles County Public Works
Office: (626) 300-4721

From: Acton Town Council <atc@actontowncouncil.org>
Sent: Monday, December 14, 2020 10:29 AM

To: Jeff Pletyak <JPLETY@dpw.lacounty.gov>; Acton Town Council
<atc@actontowncouncil.org>
Cc: Anish Saraiya <ASARAIYA@dpw.lacounty.gov>; David MacGregor
<DMACGREG@dpw.lacounty.gov>; Emiko Thompson <ETHOMP@dpw.lacounty.gov>;
Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov>
Subject: Re: FW: traffic study for Dollar General

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Petyak;

Thank you very much for your email; it was greatly appreciated. I apologize for the tardiness of this response; there are so many things going on in Acton right now that it is hard to keep up with all of it. The ATC would very much appreciate the opportunity to discuss traffic aspects of the proposed Dollar General Project with staff from the Traffic & Lighting Division. I have spoken with President Owen, and believe that for this week, Wednesday, Thursday, and Friday afternoons after 12 PM are all clear.

Thank you again for your email.

Sincerely

Jacqueline Ayer

Planning Committee Chairperson

On Tue, Nov 24, 2020 at 1:21 PM Jeff Pletyak <JPLETY@dpw.lacounty.gov> wrote:

Good afternoon Ms. Ayer

First, I would like to apologize for the delayed response to your emails. I intend to provide you with more timely responses to your inquiries moving forward.

Second, I confirmed with the project's case planner from the Department of Regional Planning (DRP) that the project is not scheduled to receive final approval. The email dated November 17 expressed concerns that the Acton Town Council was requested to provide final comments. The Acton Town Council received a copy of the project's site plan for review as part of DRP's standard practice.

Upon receipt of your emails, Public Works contacted DRP to determine the project's traffic study requirements related to significant transportation impacts. DRP is currently assessing the project's traffic study requirements and is scheduled to report back to Public Works this week.

Public Works concurrently submitted a request to the State's Office of Planning and Research (OPR) to provide clarification on the application of the screening criteria described in the "Technical Advisory on Evaluating Transportation Impacts in CEQA."

Lastly, Public Works is evaluating the project's requirements for analyzing traffic safety to address the concerns stated in the November 17 email.

If you wish to schedule a meeting with me, Ms. Thompson, and DRP to review your inquiries on the project's traffic study requirements please provide me with a list of your available meeting dates and times, and I will coordinate the meeting. Please also let me know whether you prefer to meet via a conference call, Microsoft Teams chat, or other online meeting application.

Jeffrey Pletyak, P.E.

Senior Civil Engineer

Los Angeles County Public Works

Office: (626) 300-4721

From: Acton Town Council <atc@actontowncouncil.org>

Sent: Monday, November 23, 2020 4:15 PM

To: Mark Pestrella <mpestrella@dpw.lacounty.gov>;

MPestrella@pw.lacounty.gov; Acton Town Council

<atc@actontowncouncil.org>; Saraiya, Anish

<ASaraiya@bos.lacounty.gov>

Subject: Fwd: traffic study for Dollar General

Dear Director Pestrella;

The Acton Town Council has tried diligently to communicate with Staff from the Department of Public Works regarding a project proposed in the Community of Acton, but we have never received a response to our inquiries. The first communication was sent on September 16, 2020 (see email below) and a subsequent communication was sent on November 17, 2020. Presumably, we have been submitting our request/emails to the wrong people; accordingly, and on behalf of the Acton Town Council, I respectfully request that you let us know to whom our request should be submitted so that we can get these community-critical issues addressed as quickly as possible.

Thank you for your kind attention and assistance in this matter.

Sincerely,

Jacqueline Ayer

Correspondence Secretary

----- Forwarded message -----

From: **Acton Town Council** <atc@actontowncouncil.org>

Date: Wed, Sep 16, 2020 at 2:07 PM

Subject: Fwd: traffic study for Dollar General

To: Thompson, Ms. Emiko <ethomp@dpw.lacounty.gov>, Jeff

Pletyak <JPLETY@dpw.lacounty.gov>, Saraiya, Anish

<ASaraiya@bos.lacounty.gov>, Termeer, Donna

<DTermeer@bos.lacounty.gov>, Bostwick, Chuck

<cbostwick@bos.lacounty.gov>, Acton Town Council

<atc@actontowncouncil.org>, Christina Carlon

<ccarlon@planning.lacounty.gov>

Dear Ms. Thompson;

The Acton Town Council received the following email from a resident who knows individuals involved in the development of the proposed Dollar General project. According to her, the developers anticipate a minimum of 1,500 customers per day; this estimate is corroborated by ITE trip generation rates for convenience stores (note: Dollar Generals are not considered "supermarkets"). Thus, it seems that this project will create

significant traffic in the area.

The Acton Town Council understands the the Department of Public Works has determined that the Dollar General Project does not warrant a traffic study, and we assume that this decision is based on the "Traffic Impact Analysis" ("TIA") Guidelines that were recently adopted by DPW. The new TIA Guidelines establish "screening criteria" which establish that (among other things) non-retail projects generating less than 110 vehicle trips per day and retail projects not exceeding 50,000 square feet will create transportation impacts that are deemed "less than significant", and it cites the "Technical Advisory on Evaluating Transportation Impacts in CEQA" prepared by the California Office of Planning and Research ("OPR") to justify these "screening" parameters. However, the OPR document makes no such recommendations; to the contrary, the OPR document states quite clearly on page 12 that "projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact.". In other words, the screening criteria recommended in the OPR document is 110 trips per day regardless of whether the business is retail or non-retail. Furthermore, the OPR document does not establish retail uses which are less than 50,000 square feet as the screening criteria for determining whether transportation impacts are "significant"; to the contrary, the OPR document identifies the 50,000 square foot limit as merely the point at which a use is deemed to be "regional serving" rather than "local serving" (see page 17). In other words, the screening criteria established by the new TIA Guidelines are not at all consistent with the OPR document. Moreover, and given the fact that Acton only has approximately 7,500 residents, it is clear that the 1500 customers per day that will be served by the Dollar General project will not be from the local area, this is will be by definition a "regional-serving" business and not a "local" serving business.

The Acton Town Council would like to engage with you on these issues at your earliest possible convenience; please share with us some dates and times when such a discussion can be convened.

Sincerely
Jacqueline Ayer
Planning Committee Chairperson

----- Forwarded message -----

From: **Monica Darga** <monicadarga@sbcglobal.net>

Date: Wed, Sep 16, 2020 at 9:02 AM

Subject: traffic study for Dollar General

To: atc@actontowncouncil.org <atc@actontowncouncil.org>

Hello,

I know someone who is involved in building the D.G.here in Acton.

He said the traffic is more like 1500 cars on a daily basis not 250!!!!!!

This is absurd!!!! Who is the person that decided no study was needed?

Could someone please answer me?

Thank you so much.

Monica Darga

[Sent from Yahoo Mail on Android](#)

From: [Acton Town Council](#)
To: [Richard Marshalian](#); [Mark Herwick](#); [Termeer, Donna](#); [Bostwick, Charles](#); [Acton Town Council](#)
Subject: Fwd: FW: traffic study for Dollar General
Date: Thursday, February 18, 2021 9:47:44 AM

CAUTION: External Email. Proceed Responsibly.

here is our meeting request response

----- Forwarded message -----

From: Acton Town Council <atc@actontowncouncil.org>
Date: Mon, Dec 14, 2020 at 10:28 AM
Subject: Re: FW: traffic study for Dollar General
To: Jeff Pletyak <JPLETY@dpw.lacounty.gov>, Acton Town Council <atc@actontowncouncil.org>
Cc: Anish Saraiya <ASARAIYA@dpw.lacounty.gov>, David MacGregor <DMACGREG@dpw.lacounty.gov>, Emiko Thompson <ETHOMP@dpw.lacounty.gov>, Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov>

Dear Mr. Petyak;

Thank you very much for your email; it was greatly appreciated. I apologize for the tardiness of this response; there are so many things going on in Acton right now that it is hard to keep up with all of it. The ATC would very much appreciate the opportunity to discuss traffic aspects of the proposed Dollar General Project with staff from the Traffic & Lighting Division. I have spoken with President Owen, and believe that for this week, Wednesday, Thursday, and Friday afternoons after 12 PM are all clear.

Thank you again for your email.

Sincerely
Jacqueline Ayer
Planning Committee Chairperson

On Tue, Nov 24, 2020 at 1:21 PM Jeff Pletyak <JPLETY@dpw.lacounty.gov> wrote:

Good afternoon Ms. Ayer

First, I would like to apologize for the delayed response to your emails. I intend to provide you with more timely responses to your inquiries moving forward.

Second, I confirmed with the project's case planner from the Department of Regional Planning (DRP) that the project is not scheduled to receive final approval. The email dated November 17 expressed concerns that the Acton Town Council was requested to provide final comments. The Acton Town Council received a copy of the project's site plan for review as part of DRP's standard practice.

Upon receipt of your emails, Public Works contacted DRP to determine the project's traffic study requirements related to significant transportation impacts. DRP is currently assessing the project's traffic study requirements and is scheduled to report back to Public Works this week.

Public Works concurrently submitted a request to the State's Office of Planning and Research (OPR) to provide clarification on the application of the screening criteria described in the "Technical Advisory on Evaluating Transportation Impacts in CEQA."

Lastly, Public Works is evaluating the project's requirements for analyzing traffic safety to address the concerns stated in the November 17 email.

If you wish to schedule a meeting with me, Ms. Thompson, and DRP to review your inquiries on the project's traffic study requirements please provide me with a list of your available meeting dates and times, and I will coordinate the meeting. Please also let me know whether you prefer to meet via a conference call, Microsoft Teams chat, or other online meeting application.

Jeffrey Pletyak, P.E.

Senior Civil Engineer

Los Angeles County Public Works

Office: (626) 300-4721

From: Acton Town Council <atc@actontowncouncil.org>

Sent: Monday, November 23, 2020 4:15 PM

To: Mark Pestrella <mpestrella@dpw.lacounty.gov>;

MPestrella@pw.lacounty.gov; Acton Town Council

<atc@actontowncouncil.org>; Saraiya, Anish

<ASaraiya@bos.lacounty.gov>

Subject: Fwd: traffic study for Dollar General

Dear Director Pestrella;

The Acton Town Council has tried diligently to communicate with Staff from the Department of Public Works regarding a project proposed in the Community of Acton, but we have never received a response to our inquiries. The first communication was sent on September 16, 2020 (see email below) and a subsequent communication was sent on November 17, 2020. Presumably, we have been submitting our request/emails to the wrong people; accordingly, and on behalf of the Acton Town Council, I respectfully request that you let us know to whom our request should be submitted so that we can get these community-critical issues addressed as quickly as possible.

Thank you for your kind attention and assistance in this matter.

Sincerely,

Jacqueline Ayer

Correspondence Secretary

----- Forwarded message -----

From: **Acton Town Council** <atc@actontowncouncil.org>

Date: Wed, Sep 16, 2020 at 2:07 PM

Subject: Fwd: traffic study for Dollar General

To: Thompson, Ms. Emiko <ethomp@dpw.lacounty.gov>, Jeff Pletyak <JPLETY@dpw.lacounty.gov>, Saraiya, Anish <ASaraiya@bos.lacounty.gov>, Termeer, Donna <DTermeer@bos.lacounty.gov>, Bostwick, Chuck <cbostwick@bos.lacounty.gov>, Acton Town Council <atc@actontowncouncil.org>, Christina Carlon <ccarlon@planning.lacounty.gov>

Dear Ms. Thompson;

The Acton Town Council received the following email from a resident who knows individuals involved in the development of the proposed Dollar General project. According to her, the developers anticipate a minimum of 1,500 customers per day; this estimate is corroborated by ITE trip generation rates for convenience stores (note: Dollar Generals are not considered "supermarkets"). Thus, it seems that this project will create significant traffic in the area.

The Acton Town Council understands the the Department of Public Works has determined that the Dollar General Project does not warrant a traffic study, and we assume that this decision is based on the "Traffic Impact Analysis" ("TIA") Guidelines that were recently adopted by DPW. The new TIA Guidelines establish "screening criteria" which establish that (among other things) non-retail projects generating less than 110 vehicle trips per day and retail projects not exceeding 50,000 square feet will create transportation impacts that are deemed "less than significant", and it cites the "Technical Advisory on Evaluating Transportation Impacts in CEQA" prepared by the California Office of Planning and Research ("OPR") to justify these "screening" parameters. However, the OPR document makes no such recommendations; to the contrary, the OPR document states quite clearly on page 12 that "projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact.". In other words, the screening criteria recommended in the OPR document is 110 trips per day regardless of whether the business is retail or non-retail. Furthermore, the OPR document does not establish retail uses which are less than 50,000 square feet as the screening criteria for determining whether transportation impacts are "significant"; to the contrary, the OPR document identifies the 50,000 square foot limit as merely the point at which a use is deemed to be "regional serving" rather than "local serving" (see page 17). In other words, the screening criteria established by the new TIA Guidelines are not at all consistent with the OPR document. Moreover, and given the fact that Acton only has approximately 7,500 residents, it is clear that the 1500 customers per day that will be served by the Dollar General project will not be from the local area, this is will be by definition a "regional-serving" business and not a "local" serving business.

The Acton Town Council would like to engage with you on these issues at your earliest possible convenience; please share with us some dates and times when such a discussion can be convened.

Sincerely
Jacqueline Ayer
Planning Committee Chairperson

----- Forwarded message -----

From: **Monica Darga** <monicadarga@sbcglobal.net>

Date: Wed, Sep 16, 2020 at 9:02 AM

Subject: traffic study for Dollar General

To: atc@actontowncouncil.org <atc@actontowncouncil.org>

Hello,

I know someone who is involved in building the D.G.here in Acton.

He said the traffic is more like 1500 cars on a daily basis not 250!!!!!!

This is absurd!!!! Who is the person that decided no study was needed?

Could someone please answer me?

Thank you so much.

Monica Darga

[Sent from Yahoo Mail on Android](#)

From: [Acton Town Council](#)
To: [Richard Marshalian](#); [Mark Herwick](#); [Termeer, Donna](#); [Bostwick, Charles](#); [Acton Town Council](#)
Subject: Fwd: FW: traffic study for Dollar General
Date: Thursday, February 18, 2021 9:45:24 AM

CAUTION: External Email. Proceed Responsibly.

Here is the response we received from DPW - we were grateful to receive it. we responded that we would very much like to have a meeting with them. I will next forward to you the response we received to that request.

----- Forwarded message -----

From: **Jeff Pletyak** <JPLETY@dpw.lacounty.gov>
Date: Tue, Nov 24, 2020 at 1:21 PM
Subject: FW: traffic study for Dollar General
To: atc@actontowncouncil.org <atc@actontowncouncil.org>
Cc: Anish Saraiya <ASARAIYA@dpw.lacounty.gov>, David MacGregor <DMACGREG@dpw.lacounty.gov>, Emiko Thompson <ETHOMP@dpw.lacounty.gov>, Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov>

Good afternoon Ms. Ayer

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Jeffrey Pletyak, P.E.

Senior Civil Engineer

Los Angeles County Public Works

Office: (626) 300-4721

From: Acton Town Council <atc@actontowncouncil.org>
Sent: Monday, November 23, 2020 4:15 PM
To: Mark Pestrella <mpestrella@dpw.lacounty.gov>;
MPestrella@pw.lacounty.gov; Acton Town Council
<atc@actontowncouncil.org>; Saraiya, Anish
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Subject: Fwd: traffic study for Dollar General

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addressed as quickly as possible.

Thank you for your kind attention and assistance in this matter.

Sincerely,

Jacqueline Ayer

Correspondence Secretary

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From: **Acton Town Council** <atc@actontowncouncil.org>

Date: Wed, Sep 16, 2020 at 2:07 PM

Subject: Fwd: traffic study for Dollar General

To: Thompson, Ms. Emiko <ethomp@dpw.lacounty.gov>, Jeff Pletyak <JPLETY@dpw.lacounty.gov>, Saraiya, Anish <ASaraiya@bos.lacounty.gov>, Termeer, Donna <DTermeer@bos.lacounty.gov>, Bostwick, Chuck <cbostwick@bos.lacounty.gov>, Acton Town Council <atc@actontowncouncil.org>, Christina Carlon <ccarlon@planning.lacounty.gov>

Dear Ms. Thompson;

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these "screening" parameters. However, the OPR document makes no such recommendations; to the contrary, the OPR document states quite clearly on page 12 that "projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact.". In other words, the screening criteria recommended in the OPR document is 110 trips per day regardless of whether the business is retail or non-retail. Furthermore, the OPR document does not establish retail uses which are less than 50,000 square feet as the screening criteria for determining whether transportation impacts are "significant"; to the contrary, the OPR document identifies the 50,000 square foot limit as merely the point at which a use is deemed to be "regional serving" rather than "local serving" (see page 17). In other words, the screening criteria established by the new TIA Guidelines are not at all consistent with the OPR document. Moreover, and given the fact that Acton only has approximately 7,500 residents, it is clear that the 1500 customers per day that will be served by the Dollar General project will not be from the local area, this is will be by definition a "regional-serving" business and not a "local" serving business.

The Acton Town Council would like to engage with you on these issues at your earliest possible convenience; please share with us some dates and times when such a discussion can be convened.

Sincerely
Jacqueline Ayer
Planning Committee Chairperson

----- Forwarded message -----

From: **Monica Darga** <monicadarga@sbcglobal.net>
Date: Wed, Sep 16, 2020 at 9:02 AM
Subject: traffic study for Dollar General
To: atc@actontowncouncil.org <atc@actontowncouncil.org>

Hello,

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He said the traffic is more like 1500 cars on a daily basis not 250!!!!!!

This is absurd!!!! Who is the person that decided
no study was needed?

Could someone please answer me?

Thank you so much.

Monica Darga

[Sent from Yahoo Mail on Android](#)

From: [Acton Town Council](#)
To: [Richard Marshalian](#); [Mark Herwick](#); [Termeer, Donna](#); [Bostwick, Charles](#); [Acton Town Council](#)
Subject: Fwd: FW: traffic study for Dollar General
Date: Thursday, February 18, 2021 9:52:40 AM

CAUTION: External Email. Proceed Responsibly.

Here is the next response from DPW

----- Forwarded message -----

From: Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov>
Date: Tue, Dec 22, 2020 at 5:15 PM
Subject: RE: FW: traffic study for Dollar General
To: atc@actontowncouncil.org <atc@actontowncouncil.org>
Cc: Saraiya, Anish <ASaraiya@bos.lacounty.gov>, David MacGregor <DMACGREG@dpw.lacounty.gov>, Emiko Thompson <ETHOMP@dpw.lacounty.gov>, Jeff Pletyak <JPLETY@dpw.lacounty.gov>

Good afternoon Ms. Ayer

Sorry for the Delay, but it will be a couple more weeks before the County meets on this project. We will get back to when we have additional information for you. Thank you.

Amir S. Ibrahim, P.E., L.S.

Principal Engineer

Los Angeles County Public Works

Office: (626) 300-4713

From: Jeff Pletyak
Sent: Tuesday, December 15, 2020 4:58 PM
To: Acton Town Council <atc@actontowncouncil.org>
Cc: Anish Saraiya <ASARAIYA@dpw.lacounty.gov>; David MacGregor <DMACGREG@dpw.lacounty.gov>; Emiko Thompson <ETHOMP@dpw.lacounty.gov>; Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov>
Subject: RE: FW: traffic study for Dollar General

Good afternoon Ms. Ayer

We are currently coordinating the meeting availability with the representatives from the Department of Regional Planning.

To assist in coordinating the various schedules, we will send an email to all meeting attendees with a Doodle poll to survey everyone's meeting availability. Upon completion of the Doodle poll, we will confirm the meeting schedule date and time with you and the Acton Town Council.

Jeffrey Pletyak, P.E.

Senior Civil Engineer

Los Angeles County Public Works

Office: (626) 300-4721

From: Acton Town Council <atc@actontowncouncil.org>

Sent: Monday, December 14, 2020 10:29 AM

To: Jeff Pletyak <JPLETY@dpw.lacounty.gov>; Acton Town Council <atc@actontowncouncil.org>

Cc: Anish Saraiya <ASARAIYA@dpw.lacounty.gov>; David MacGregor <DMACGREG@dpw.lacounty.gov>; Emiko Thompson <ETHOMP@dpw.lacounty.gov>; Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov>

Subject: Re: FW: traffic study for Dollar General

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Petyak;

Thank you very much for your email; it was greatly appreciated. I apologize for the tardiness of this response; there are so many things going on in Acton right now that it is hard to keep up with all of it. The ATC would very much appreciate the opportunity to discuss traffic aspects of the proposed Dollar General Project with staff from the Traffic & Lighting Division. I have spoken with President Owen, and believe that for this week, Wednesday, Thursday, and Friday afternoons after 12 PM are all clear.

Thank you again for your email.

Sincerely

Jacqueline Ayer

Planning Committee Chairperson

On Tue, Nov 24, 2020 at 1:21 PM Jeff Pletyak <JPLETY@dpw.lacounty.gov> wrote:

Good afternoon Ms. Ayer

First, I would like to apologize for the delayed response to your emails. I intend to provide you with more timely responses to your inquiries moving forward.

Second, I confirmed with the project's case planner from the Department of Regional Planning (DRP) that the project is not scheduled to receive final approval. The email dated November 17 expressed concerns that the Acton Town Council was requested to provide final comments. The Acton Town Council received a copy of the project's site plan for review as part of DRP's standard practice.

Upon receipt of your emails, Public Works contacted DRP to determine the project's traffic study requirements related to significant transportation impacts. DRP is currently assessing the project's traffic study requirements and is scheduled to report back to Public Works this week.

Public Works concurrently submitted a request to the State's Office of Planning and Research (OPR) to provide clarification on the application of the screening criteria described in the "Technical Advisory on Evaluating Transportation Impacts in CEQA."

Lastly, Public Works is evaluating the project's requirements for analyzing traffic safety to address the concerns stated in the November 17 email.

If you wish to schedule a meeting with me, Ms. Thompson, and DRP to review your inquiries on the project's traffic study requirements please provide me with a list of

your available meeting dates and times, and I will coordinate the meeting. Please also let me know whether you prefer to meet via a conference call, Microsoft Teams chat, or other online meeting application.

Jeffrey Pletyak, P.E.

Senior Civil Engineer

Los Angeles County Public Works

Office: (626) 300-4721

From: Acton Town Council <atc@actontowncouncil.org>
Sent: Monday, November 23, 2020 4:15 PM
To: Mark Pestrella <mpestrella@dpw.lacounty.gov>;
MPestrella@pw.lacounty.gov; Acton Town Council
<atc@actontowncouncil.org>; Saraiya, Anish
<ASaraiya@bos.lacounty.gov>
Subject: Fwd: traffic study for Dollar General

Dear Director Pestrella;

The Acton Town Council has tried diligently to communicate with Staff from the Department of Public Works regarding a project proposed in the Community of Acton, but we have never received a response to our inquiries. The first communication was sent on September 16, 2020 (see email below) and a subsequent communication was sent on November 17, 2020. Presumably, we have been submitting our request/emails to the wrong people; accordingly, and on behalf of the Acton Town Council, I respectfully request that you let us know to whom our request should be submitted so that we can get these community-critical issues addressed as quickly as possible.

Thank you for your kind attention and assistance in this matter.

Sincerely,

Jacqueline Ayer

Correspondence Secretary

----- Forwarded message -----

From: **Acton Town Council** <atc@actontowncouncil.org>

Date: Wed, Sep 16, 2020 at 2:07 PM

Subject: Fwd: traffic study for Dollar General

To: Thompson, Ms. Emiko <ethomp@dpw.lacounty.gov>, Jeff

Pletyak <JPLETY@dpw.lacounty.gov>, Saraiya, Anish

<ASaraiya@bos.lacounty.gov>, Termeer, Donna

<DTermeer@bos.lacounty.gov>, Bostwick, Chuck

<cbostwick@bos.lacounty.gov>, Acton Town Council

<atc@actontowncouncil.org>, Christina Carlon

<ccarlon@planning.lacounty.gov>

Dear Ms. Thompson;

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The Acton Town Council understands the the Department of Public Works has determined that the Dollar General Project does not warrant a traffic study, and we assume that this decision is based on the "Traffic Impact Analysis" ("TIA") Guidelines that were recently adopted by DPW. The new TIA Guidelines establish "screening criteria" which establish that (among other things) non-retail projects generating less than 110 vehicle trips per day and retail projects not exceeding 50,000 square feet will create transportation impacts that are deemed "less than significant", and it cites the "Technical Advisory on Evaluating Transportation Impacts in CEQA" prepared by the California Office of Planning and Research ("OPR") to justify these "screening" parameters. However, the OPR document makes no such recommendations; to the contrary, the OPR document states quite clearly on page 12 that "projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact.". In other words, the screening criteria recommended in the OPR document is 110 trips per day regardless of whether the business is retail or non-retail. Furthermore, the OPR document does not establish retail uses which are less than 50,000 square feet as the screening criteria for determining whether

transportation impacts are "significant"; to the contrary, the OPR document identifies the 50,000 square foot limit as merely the point at which a use is deemed to be "regional serving" rather than "local serving" (see page 17). In other words, the screening criteria established by the new TIA Guidelines are not at all consistent with the OPR document. Moreover, and given the fact that Acton only has approximately 7,500 residents, it is clear that the 1500 customers per day that will be served by the Dollar General project will not be from the local area, this is will be by definition a "regional-serving" business and not a "local" serving business.

The Acton Town Council would like to engage with you on these issues at your earliest possible convenience; please share with us some dates and times when such a discussion can be convened.

Sincerely
Jacqueline Ayer
Planning Committee Chairperson

----- Forwarded message -----

From: **Monica Darga** <monicadarga@sbcglobal.net>

Date: Wed, Sep 16, 2020 at 9:02 AM

Subject: traffic study for Dollar General

To: atc@actontowncouncil.org <atc@actontowncouncil.org>

Hello,

I know someone who is involved in building the D.G.here in Acton.

He said the traffic is more like 1500 cars on a daily basis not 250!!!!!!

This is absurd!!!! Who is the person that decided
no study was needed?

Could someone please answer me?

Thank you so much.

Monica Darga

Sent from Yahoo Mail on Android

From: [Acton Town Council](#)
To: [Richard Marshalian](#); [Mark Herwick](#); [Termeer, Donna](#); [Bostwick, Charles](#); [Acton Town Council](#)
Subject: Fwd: FW: traffic study for Dollar General
Date: Thursday, February 18, 2021 9:52:38 AM

CAUTION: External Email. Proceed Responsibly.

This is the last we heard from anyone about the traffic issue - it was 2 months ago

----- Forwarded message -----

From: Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov>
Date: Wed, Dec 23, 2020 at 8:56 AM
Subject: RE: FW: traffic study for Dollar General
To: Acton Town Council <atc@actontowncouncil.org>
Cc: Saraiya, Anish <ASaraiya@bos.lacounty.gov>, David MacGregor <DMACGREG@dpw.lacounty.gov>, Emiko Thompson <ETHOMP@dpw.lacounty.gov>, Jeff Pletyak <JPLETY@dpw.lacounty.gov>

Hi Ms. Ayers, we will take your request into consideration. Thank you.

Amir S. Ibrahim, P.E., L.S.

Principal Engineer

Los Angeles County Public Works

Office: (626) 300-4713

From: Acton Town Council <atc@actontowncouncil.org>
Sent: Wednesday, December 23, 2020 8:49 AM
To: Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov>
Cc: Saraiya, Anish <ASaraiya@bos.lacounty.gov>; David MacGregor <DMACGREG@dpw.lacounty.gov>; Emiko Thompson <ETHOMP@dpw.lacounty.gov>; Jeff Pletyak <JPLETY@dpw.lacounty.gov>; Acton Town Council <atc@actontowncouncil.org>
Subject: Re: FW: traffic study for Dollar General

CAUTION: External Email. Proceed Responsibly.

Dear Mr Ibrahim;

Thank you for your email. It sounds like Traffic & Lighting will confer with the ATC *after* County staff meet and

discuss the project; we had hoped that we could have an advanced discussion with T & L regarding the new Transportation Impact Analysis Guidelines by using it as a lense to look at the Dollar General Project. We had also hoped that we would be permitted to share our thoughts on the project with T&L *before* "the County meets on this project" so that our comments and concerns could be factored into the discussion that T&L and other County staff will have about this project. However, from your email, it sounds like both of these hopes are dashed. I am concerned that a discussion between the ATC and T&L after the fact will be little more than a post-hoc clarification of a decision already made rather than the thoughtful discussion of issues that we had hoped for. But at this point, we will take whatever we can get. However , please let me know if there is any way that we could possibly confer with T&L *before* "the County meets on this project"

Sincerely

Jacqueline Ayer

Planning Committee Chairperson

On Tue, Dec 22, 2020 at 5:15 PM Amir Ibrahim <AIBRAHIM@dpw.lacounty.gov> wrote:

Good afternoon Ms. Ayer

Sorry for the Delay, but it will be a couple more weeks before the County meets on this project. We will get back to when we have additional information for you. Thank you.

Amir S. Ibrahim, P.E., L.S.

Principal Engineer

Los Angeles County Public Works

Office: (626) 300-4713

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Subject: Fwd: traffic study for Dollar General

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To: Thompson, Ms. Emiko <ethomp@dpw.lacounty.gov>, Jeff Pletyak <JPLETY@dpw.lacounty.gov>, Saraiya, Anish <ASaraiya@bos.lacounty.gov>, Termeer, Donna <DTermeer@bos.lacounty.gov>, Bostwick, Chuck <cbostwick@bos.lacounty.gov>, Acton Town Council <atc@actontowncouncil.org>, Christina Carlon <ccarlon@planning.lacounty.gov>

Dear Ms. Thompson;

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The Acton Town Council would like to engage with you on these issues at your earliest possible convenience; please share with us some dates and times when such a discussion can be convened.

Sincerely
Jacqueline Ayer
Planning Committee Chairperson

----- Forwarded message -----

From: **Monica Darga** <monicadarga@sbcglobal.net>
Date: Wed, Sep 16, 2020 at 9:02 AM
Subject: traffic study for Dollar General
To: atc@actontowncouncil.org <atc@actontowncouncil.org>

Hello,

I know someone who is involved in building the D.G. here in Acton.

He said the traffic is more like 1500 cars on a daily basis not 250!!!!!!

This is absurd!!!! Who is the person that decided

no study was needed?

Could someone please answer me?

Thank you so much.

Monica Darga

[Sent from Yahoo Mail on Android](#)

From: [Acton Town Council](#)
To: [Richard Marshalian](#); [Mark Herwick](#); [Termeer, Donna](#); [Bostwick, Charles](#); [Acton Town Council](#)
Subject: Fwd: traffic study for Dollar General
Date: Thursday, February 18, 2021 9:42:36 AM

CAUTION: External Email. Proceed Responsibly.

Followup email we sent because we never received a response to our earlier communication
----- Forwarded message -----

From: Acton Town Council <atc@actontowncouncil.org>
Date: Tue, Nov 17, 2020 at 11:41 AM
Subject: Fwd: traffic study for Dollar General
To: Christina Carlon <ccarlon@planning.lacounty.gov>, Termeer, Donna <DTermeer@bos.lacounty.gov>, Jeff Pletyak <JPLETY@dpw.lacounty.gov>, Saraiya, Anish <ASaraiya@bos.lacounty.gov>, Bostwick, Chuck <cbostwick@bos.lacounty.gov>, Acton Town Council <atc@actontowncouncil.org>, Thompson, Ms. Emiko <ethomp@dpw.lacounty.gov>

To the Department of Public Works;

The Acton Town Council has no record of a DPW response to the inquiry submitted on September 16, 2020 addressing the proposed "Dollar General" project (please see email trail below). The matter has become rather critical, because it appears that the ATC is now being asked to provide final comments on the project, and we are unable to do so until the traffic issue is further resolved. As you know, it is unreasonable to assume that any new commercial business generating 1,500 vehicle trips per day will not create any traffic impacts, particularly at a location that is so near the "Acton School" where the local school district maintains its "Special Education" preschool program as well as the "Transitional Kindergarten" program. These programs require multiple dropoff and pickup cycles. The Acton School also serves as the location for the School District's Bus Yard, with busses entering and exiting all day; besides transporting school children, the busses also pick up and deliver hot and cold meals to the Acton School (since there is no operating cafeteria at this location). Also, the Acton School is home to the Assurance Charter School. In short, this school site is very sensitive to traffic impacts and safety considerations are important. The Acton School and the Dollar General are only 1,300 feet apart and are accessed via the same street (Crown Valley Road); school children frequently cross this street to get to the Acton Park. Given these circumstances, it is imperative that the County properly consider traffic and safety impacts at this location before it approves a commercial project that will generate 1,500 vehicle trips per day.

The ATC anxiously awaits your reply.

Sincerely
Jacqueline Ayer
Planning Committee Chairperson

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From: Acton Town Council <atc@actontowncouncil.org>

Date: Wed, Sep 16, 2020 at 2:07 PM

Subject: Fwd: traffic study for Dollar General

To: Thompson, Ms. Emiko <ethomp@dpw.lacounty.gov>, Jeff Pletyak <JPLETY@dpw.lacounty.gov>, Saraiya, Anish <ASaraiya@bos.lacounty.gov>, Termeer, Donna <DTermeer@bos.lacounty.gov>, Bostwick, Chuck <cbostwick@bos.lacounty.gov>, Acton Town Council <atc@actontowncouncil.org>, Christina Carlon <ccarlon@planning.lacounty.gov>

Dear Ms. Thompson;

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The Acton Town Council would like to engage with you on these issues at your earliest possible convenience; please share with us some dates and times when such a discussion can be convened.

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From: **Monica Darga** <monicadarga@sbcglobal.net>

Date: Wed, Sep 16, 2020 at 9:02 AM

Subject: traffic study for Dollar General

To: atc@actontowncouncil.org <atc@actontowncouncil.org>

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Monica Darga

[Sent from Yahoo Mail on Android](#)

From: [Acton Town Council](#)
To: [Richard Marshalian](#); [Mark Herwick](#); [Termeer, Donna](#); [Bostwick, Charles](#); [Acton Town Council](#)
Subject: Fwd: traffic study for Dollar General
Date: Thursday, February 18, 2021 9:39:51 AM

CAUTION: External Email. Proceed Responsibly.

Here is the followup email we sent to DPW addressing our concerns regarding the projected 1500 trips per day and the County's new traffic impact guidelines which consider non-retail facilities to have potentially significant traffic impacts if they merely generate 110 trips per day, but retail facilities aren't considered to pose potentially significant traffic impact unless they are larger than 50,000 square feet (which creates tens of thousands of trips per day). The disparity is remarkable, and the County's new guidelines have completely mis-stated thresholds adopted by the California Office of Planning and Research.

We never received a response so we followed up with another email that I will forward to you next

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To: [Richard Marshalian](#); [Mark Herwick](#); [Termeer, Donna](#); [Bostwick, Charles](#); [Acton Town Council](#)
Subject: Fwd: traffic study for Dollar General
Date: Thursday, February 18, 2021 9:43:13 AM

CAUTION: External Email. Proceed Responsibly.

Out of desperation, we reached out to Director Pestrella who has always been very responsive and good to our community.... here is our email

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From: **Acton Town Council** <atc@actontowncouncil.org>
Date: Mon, Nov 23, 2020 at 4:14 PM
Subject: Fwd: traffic study for Dollar General
To: Mark Pestrella <mpestrella@dpw.lacounty.gov>, <MPestrella@pw.lacounty.gov>, Acton Town Council <atc@actontowncouncil.org>, Saraiya, Anish <ASaraiya@bos.lacounty.gov>

Dear Director Pestrella;

The Acton Town Council has tried diligently to communicate with Staff from the Department of Public Works regarding a project proposed in the Community of Acton, but we have never received a response to our inquiries. The first communication was sent on September 16, 2020 (see email below) and a subsequent communication was sent on November 17, 2020. Presumably, we have been submitting our request/emails to the wrong people; accordingly, and on behalf of the Acton Town Council, I respectfully request that you let us know to whom our request should be submitted so that we can get these community-critical issues addressed as quickly as possible.

Thank you for your kind attention and assistance in this matter.

Sincerely,
Jacqueline Ayer
Correspondence Secretary

----- Forwarded message -----

From: **Acton Town Council** <atc@actontowncouncil.org>
Date: Wed, Sep 16, 2020 at 2:07 PM
Subject: Fwd: traffic study for Dollar General
To: Thompson, Ms. Emiko <ethomp@dpw.lacounty.gov>, Jeff Pletyak <JPLETY@dpw.lacounty.gov>, Saraiya, Anish <ASaraiya@bos.lacounty.gov>, Termeer, Donna <DTermeer@bos.lacounty.gov>, Bostwick, Chuck <cbostwick@bos.lacounty.gov>, Acton Town Council <atc@actontowncouncil.org>, Christina Carlon <ccarlon@planning.lacounty.gov>

Dear Ms. Thompson;

The Acton Town Council received the following email from a resident who knows individuals involved in the development of the proposed Dollar General project. According to her, the developers anticipate a minimum of 1,500 customers per day; this estimate is corroborated by ITE trip generation rates for convenience stores (note: Dollar Generals are not considered

"supermarkets"). Thus, it seems that this project will create significant traffic in the area.

The Acton Town Council understands the the Department of Public Works has determined that the Dollar General Project does not warrant a traffic study, and we assume that this decision is based on the "Traffic Impact Analysis" ("TIA") Guidelines that were recently adopted by DPW. The new TIA Guidelines establish "screening criteria" which establish that (among other things) non-retail projects generating less than 110 vehicle trips per day and retail projects not exceeding 50,000 square feet will create transportation impacts that are deemed "less than significant", and it cites the "Technical Advisory on Evaluating Transportation Impacts in CEQA" prepared by the California Office of Planning and Research ("OPR") to justify these "screening" parameters. However, the OPR document makes no such recommendations; to the contrary, the OPR document states quite clearly on page 12 that "projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact.". In other words, the screening criteria recommended in the OPR document is 110 trips per day regardless of whether the business is retail or non-retail. Furthermore, the OPR document does not establish retail uses which are less than 50,000 square feet as the screening criteria for determining whether transportation impacts are "significant"; to the contrary, the OPR document identifies the 50,000 square foot limit as merely the point at which a use is deemed to be "regional serving" rather than "local serving" (see page 17). In other words, the screening criteria established by the new TIA Guidelines are not at all consistent with the OPR document. Moreover, and given the fact that Acton only has approximately 7,500 residents, it is clear that the 1500 customers per day that will be served by the Dollar General project will not be from the local area, this is will be by definition a "regional-serving" business and not a "local" serving business.

The Acton Town Council would like to engage with you on these issues at your earliest possible convenience; please share with us some dates and times when such a discussion can be convened.

Sincerely
Jacqueline Ayer
Planning Committee Chairperson

----- Forwarded message -----

From: **Monica Darga** <monicadarga@sbcglobal.net>
Date: Wed, Sep 16, 2020 at 9:02 AM
Subject: traffic study for Dollar General
To: atc@actontowncouncil.org <atc@actontowncouncil.org>

Hello,
I know someone who is involved in building the D.G.here in Acton.
He said the traffic is more like 1500 cars on a daily basis not 250!!!!!!

This is absurd!!!! Who is the person that decided
no study was needed?

Could someone please answer me?
Thank you so much.
Monica Darga

[Sent from Yahoo Mail on Android](#)

From: [Acton Town Council](#)
To: [Christopher La Farge](#); [Acton Town Council](#); [Richard Marshalian](#); [Mark Herwick](#)
Subject: Re: Car Sales Project in Acton
Date: Thursday, February 18, 2021 6:17:42 PM
Attachments: [backbone trail map from 2012.pdf](#)

CAUTION: External Email. Proceed Responsibly.

Dear Mr. La Farge;

Thank you for the update. As an FYI, all commercial development in Acton is supposed to be "local-serving", which means it should must be configured to accommodate local community needs including "active transport" mechanisms which (among other things) include equestrian modes of transportation. Also, the Antelope Valley Area Plan mandates that this project include both a trail and a pedestrian pathway because it involves a new commercial buildings on commercially zoned parcels in Acton. For added impetus, it appears that the project is located on a mapped backbone trail (see attached). So, it certainly appears that the project would not be in conformance with the AV Area Plan in terms of being either "local serving" or having a required trail and pedestrian pathway if a trail is not included. So this raises a question: if the project does not have a trail, what features does it have which demonstrate that it is indeed "local serving"?

Sincerely
Jacqueline Ayer

On Fri, Feb 5, 2021 at 12:09 PM Christopher La Farge <CLaFarge@planning.lacounty.gov> wrote:

Hello Ms. Ayer,

My apologies for this delayed reply. The project is still pending review by the LA County Public Works Land Development Division and Traffic Studies Section.

Separately, the Acton Community Standards District may require trail easements as part of the conditions for any land division, and the same applies for discretionary projects if there's a nexus. An example of a nexus would be an existing nearby trail mapped on the Department of Parks and Recreation Trails Master Plan.

This project is ministerial. If the applicant is open to providing a trail, it will be on a voluntary basis. Currently, the project does not include a trail.

Best Regards,

Chris La Farge, MPL

Regional Planner

Department of Regional Planning

County of Los Angeles

320 W. Temple Street

Suite 1360

Los Angeles, CA 90012

Open M, Tu, & Thu 7:30am – 5:30pm

Open W 8:30am – 5:30pm

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<http://planning.lacounty.gov/>



In response to the evolving coronavirus emergency, Los Angeles County facilities are closed to the public at this time. For the most current information about available services, public meeting schedules, and planning projects, please visit planning.lacounty.gov

From: Acton Town Council [mailto:atc@actontowncouncil.org]

Sent: Thursday, January 28, 2021 3:14 PM

To: Christopher La Farge <CLaFarge@planning.lacounty.gov>; Acton Town Council

<atc@actontowncouncil.org>

Subject: Car Sales Project in Acton

CAUTION: External Email. Proceed Responsibly.

Dear Mr. La Farge;

Can you please clarify the status of the Car Sales project in Acton, and please let us know whether or not the project includes a trail?

Thank you

Jacqueline Ayer

Correspondence Secretary