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6 October 2014

SENT VIA EMAIL

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

Dear Mr. Nadela,

Re: Antelope Valley Area Plan Draft Environmental Impact Review Comments

Our town council appreciates the opportunity to comment on the Antelope Valley Area Plan Draft Environmental Impact Review (AVAP, DEIR). We are concerned about several aspects of the newly revised AVAP. It speaks of a Rural Preservation Strategy, but throughout the Plan, goals and policies direct all residential, commercial, and industrial development to rural towns. Land use changes and zoning are special concerns, and insertion of Economic Opportunity Areas (EOAs) are targeted to areas that are completely, or mostly rural, and have limited or no such development at this point. In the rush to get this document to the Planning Commission, updated information and, especially, maps, were not available with time to review prior to the public hearing, leaving us with precious little time to respond. How can the DEIR adequately reflect and analyze an essentially unfinished AVAP that changes in the days before the hearing and after the DEIR is released?

To begin, we would like to point out some obvious map references and exclusions in the DEIR. Figure 3-4a is a map we would like to confirm as more appropriate for rural preservation in the western Antelope Valley. It differs from other maps that reflect the requests of the Tejon Ranch, building, business, and real estate lobbies, in that it shows lower densities in the northwest county. Figure 3-6, proposed Significant Ecological Areas (SEA) should remain and not be gerrymandered by above referenced lobbies. Furthermore, Chapter 5, page 5.1-16, referenced Policy COS 13.1, which states, "Direct utility-scale renewable energy production facilities, such as solar facilities and wind facilities, to priority locations on the Renewable Energy Production Map (Zones 1 through 3) where environmental, noise, and visual impacts will be minimized." This map was retracted 9/08/2011, and focused renewable energy development within the viewshed of the State of California Poppy Reserve, and residents of Portal Ridge and Lakes areas. Finally, our town council

letter is listed and available in Appendix B, pages 49-56/100, but it is not analyzed with other letters in the Executive Summary, even though it was sent within the time frame required by the Notice of Preparation. We request that it be summarized and addressed along with other letters in the Executive Summary of the Final EIR (FEIR). We believe the information we presented is important for readers of the DEIR and subsequent FEIR, and are disturbed that our letter was left out of Table 1-2. Often, readers rely upon the Executive Summary for overview of the proposed project and to glean important points of interest for further review that are more deeply placed within the document.

Our discouragement and disappointment are surely felt as a result of the actions of the Regional Planning Commission's decision to excise the Tejon Ranch's Centennial Project property from SEA 21 and change boundaries of several SEAs without producing an updated map for public review, or noticing parties via email in time to make public comments at the September 27th meeting. It has been our informed understanding that inclusion of areas is science-based, as evidenced by the biological studies listed on the county's own website, and statements of proven biological value presented throughout the DEIR. We support expansion of Significant Ecological Areas (SEAs) and continue to do so, and want to see the original proposed map remain as final in the Plan.

Since when do business and building development organizations decide SEA boundaries? Have they provided extensive biological review to prove the exclusion? Has Regional Planning proved the retraction will not harm sensitive environments, wildlife corridors, and USGS identified evolutionary biodiversity "hot spots"? This was in our NOP letter, but never specifically addressed in the DEIR. In the case of Tejon Ranch-Centennial Project, which is adjacent to Critical Condor Habitat, location of the convergence of the Transverse Ranges, the Tehachapi Mountains, and the Sierra Pelona Range; will the development irreparably harm these crucial wildlife and environmental resources? The DEIR states significant unavoidable impacts. This is not beyond at least partial mitigation. Reduce densities, preserve open-space and SEA 21, and eliminate the western Economic Opportunity Area (EOA), as would be indicated in the Alternative Land Use Map option—that needs more clarification. We continue to wonder how directing high-density residential, commercial, and industrial development to rural lands will protect these areas of biological importance.

Further evidence of the need to reevaluate the changes to SEA boundaries to exclude focused intensive development proposed in the western Antelope Valley (AV) is its designation by the Audubon Society as a Globally Important Bird Area. The DEIR does not adequately discuss the area's importance to birds and their Pacific Flyway migration route. We would like inclusion of discussion of impacts to migratory birds allowed by industrial development in rural areas crucial to their survival, like agricultural and open-space lands targeted by the County for renewable energy development (conversion of A-1 to A-2). The western AV is also home to Condors. We submitted a map of Condor GPS locations in our NOP letter, showing their visits to the proposed Centennial Project and surrounding areas which contain increased residential densities and commercial and industrial development. No bird resource information was included in Appendix G. Additionally, wildlife corridors referenced in Appendix G cross the area where the Centennial land use map requests increased density within their EOA. Sprawl effects have not been evaluated, and may allow piecemeal development in this important natural area.

With regard to Centennial, the county's own Significant Ecological Area Technical Advisory Committee (SEATAC) recommended: “To insure preservation of the biological resources of the open space there needs to be a detailed management plan. Although it is typical to have such a plan approved by County without public input after the EIR has been approved, in this case the impact is so substantial that SEATAC thinks the detailed plan should be part of the EIR and subject to SEATAC review as well as to public comment. The permit on the EIR once granted, cannot be revoked, neither legally, nor in the de facto sense” (SEATAC Meeting Minutes, 9/8/2008, 13/47). There is no indication of final review of the AVAP Land Use Map by SEATAC, even though Community Standards District documents must be reviewed by them if community boundaries fall within SEAs. There was no public discussion of a habitat management plan as suggested when the Land Use Map was created and went through various iterations. Furthermore, the last visit to SEATAC was September 2008; subsequently, the Centennial Specific Plan was dropped, and then inserted into the AVAP Land Use Map. It appears to have skirted continued scrutiny by SEATAC and more stringent environmental review that would have detailed cumulative impacts and sought input from the public. As the Specific Plan stood on the last review, “SEATAC determined that the present design of the Centennial project is NOT COMPATIBLE with the principles of the Portal Ridge/Liebre Mountain SEA and NOT COMPATIBLE with the principles of the Tehachapi Foothills SEA.” It was requested the project incorporate changes and further recommendations would be forthcoming from SEATAC.

This begs the question, why has Regional Planning allowed intensive land use, incompatible zoning, and an expansive EOA in the western AV that conflicts with the proposed AVAP policies that “emphasize the conservation of SEAs and open-space areas,” and “the Proposed Project includes expanded SEA boundaries and reduced densities” (DEIR, 7.4.4). Additionally, Policy LU 2.1 indicates, “Limit the amount of potential development in Significant Ecological Areas, including Joshua Tree Woodlands, wildlife corridors, and other sensitive habitat areas, through appropriate land use designations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan” (5.4-73). Not only that, but the DEIR explains, “The proposed SEAs provide linkages and corridors to promote regional species movement within the Project Area; these linkages are critical for conserving habitat and biodiversity, and in some cases these SEAs overlap with Regional Wildlife Linkages,” and “the updated SEA boundaries are based on the latest biological information and GIS mapping data, they are considered biologically superior to the smaller SEA boundaries designated in the Adopted Area Plan” (5.4-68; 7.4.4).

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "Susan Zahnter".

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

