

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



August 29, 2011

Mr. Mitch Glaser, AICP
Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

Preliminary Draft Antelope Valley Area Plan

Dear Mr. Glaser:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State planning agency in the Rim of the Valley Zone, which includes a large portion of the Antelope Valley Planning Area. The Conservancy commends the County for the visionary approach to resource management and land use planning that runs throughout the draft plan. The planning framework that targets growth into existing areas with supporting infrastructure is the *only* sustainable way for the Antelope Valley to grow. In the context of this general support, the Conservancy makes the following specific comments and suggestions.

Land Use Goals for High Desert Corridor Should be Included in Plan Update

As stated in the plan, the High Desert Corridor (HDC) promises to transform portions of the planning area. While an exact route has yet to be determined, planning for the HDC is far enough along to develop specific land use and other strategies to mitigate its impacts. The Desert and Mountain Conservation Authority (DMCA), a joint-powers partner of the Conservancy, wrote a detailed letter as part of the HDC project scoping in October of last year (attached). The Conservancy shares DMCA's assessment of the project's potential impacts. Setting aside the merits of the project, the Conservancy believes that the County should not wait to craft the principles under which the freeway will be planned and should instead proactively address land use impacts in the current plan update.

The DMCA outlines a two-fold approach to planning for the HDC. First, the physical design of the project should minimize impacts to biological resources including clear-span bridges and other strategies to maximize the permeability of the corridor to wildlife movement. While project design is outside the scope of the plan update, general design principles are appropriate to include as plan policies.

Mr. Mitch Glaser, Supervising Regional Planner
Preliminary Draft Antelope Valley Area Plan
August 29, 2011
Page 2

Second, improvements to the transportation system should be evaluated in a dynamic planning relationship with land use policy. In much of Los Angeles County, freeways are constructed or widened without consideration of the land use changes that result. Capacity expansions frequently induce changes in housing and employment patterns that negate congestion-reduction benefits in just a few years after project completion. Without travel demand strategies, such as accurate pricing, and strong land use controls, regional transportation improvements fall victim to commute-related congestion.

Therefore, the Conservancy requests the following additional policy:

Policy M 6.9: In planning for all regional transportation systems, consider and mitigate potential impacts to wildlife movement and other biological resources in project selection and design, and coordinate transportation improvements with land use strategies to minimize habitat loss and maximize connectivity.

The construction of the HDC must not prompt a departure from the vision of the plan update. The Conservancy is concerned that, without strong land use controls, access to greater remote areas will induce future growth patterns typical of the pre-housing bust Antelope Valley. While the zoning of the preliminary draft plan is appropriate, the plan ominously proposes to reevaluate the land use map in conjunction with the HDC. The Land Use Element states:

A comprehensive study of the Area Plan should be undertaken when a preferred alignment for the HDC is identified and funded for construction. The study should carefully consider potential changes to the Area Plan, including the Land Use Policy Map, *balancing the need for economic development and local employment with environmental priorities*. If the study recommends changes to the Area Plan, a Plan Amendment may be initiated to adopt those changes, pursuant to the County's environmental review and public hearing procedures. (Emphasis added)

While the need for plans to reflect changes on the ground cannot be disputed, the overly broad scope of this proposed revision paves the way for future ill-advised upzoning. The DMCA letter proposes a series of land use and acquisition mitigation measures that support the preliminary draft plan's vision of a mosaic of rural communities amidst an extraordinary environmental setting. The Conservancy requests that the above paragraph be revised to

Mr. Mitch Glaser, Supervising Regional Planner
Preliminary Draft Antelope Valley Area Plan
August 29, 2011
Page 3

restate the plan update's vision and narrow the scope of future expected changes to increasing economic opportunity within existing communities. The Conservancy further requests that the DMCA's vision for a limited-access, freight-priority corridor surrounded by open space be incorporated into the County plan. The HDC should only provide access to existing communities and decidedly avoid growth-inducing access to rural preserve areas.

To ensure compatibility of the HDC with the plan's vision statement, the Conservancy requests the following policy additions and revisions:

Policy M 5.1: Support the development of the High Desert Corridor to provide a route for truck traffic between Interstate 5, State Route 14, and Interstate 15. Employ travel demand strategies, such as tolls and congestion pricing, to ensure the priority of freight movement on the High Desert Corridor.

Policy M 6.10: Discourage new transportation improvements in rural preserve areas. Prohibit new freeway interchanges in rural preserve areas, except to provide direct access to existing rural town areas.

Mobility Element Should Address Biological Impacts of Transportation Infrastructure

The Conservancy strongly supports several mobility policies in the draft plan. In particular, for both rural highways and local streets, the plan minimizes road pavement widths, which decreases impacts both in terms of physical footprint and wildlife movement. Additionally, the plan discourages street lighting, which will also benefit light-sensitive ecosystems in rural areas. However, vehicle-induced mortality continues to be a leading cause of wildlife mortality in Los Angeles County, affecting common and special status species alike. Without adequate crossing facilities, roads divide habitat blocks and become population sinks. Reducing vehicle-wildlife collisions with road design is both a public safety issue and essential to preserving the Antelope Valley's extraordinary environmental setting.

To address these issues, the Conservancy requests the following additional policy:

Policy M 3.6: In rural areas, require wildlife crossing structures to be included in rural highway projects. Encourage the use of clear-span bridges whenever feasible and enlarged culverts elsewhere. Fencing should be designed to funnel wildlife to safe crossing points.

Trail Dedications Require Funding for Implementation

The draft plan includes a series of policies that strongly promote trail development throughout the Antelope Valley Plan Area. The Conservancy strongly supports these policies and looks forward to working with the County and DMCA to implement the Trails Plan. In the Conservancy's experience, required trail dedications from developers are difficult to implement without an attached funding source. Unless dedicated trails are also funded and/or constructed, they often sit idle for years until a receiving entity can open them to the public. This constitutes a temporal loss of recreational resources and should be remedied during the development review process by requiring that trail dedications be fully-funded by the developer. Only provision of a fully-functioning trail system mitigates for impacts to recreational resources.

To address this deficiency, the Conservancy requests the following revision to Policy M 10.2:

Policy M 10.2: Connect new developments to existing population centers with trails, requiring trail dedication through the development review and permitting process. Require that trail easements be dedicated to an open space agency or other entity acceptable to the County. Require that, when appropriate, trails be constructed or fully-funded as a development permit condition.

Conservation and Open Space Element Will Protect Sensitive Resources

The Conservation and Open Space Element provides the necessary framework to conserve the Antelope Valley's unique and sensitive natural resources. The Conservancy strongly supports both the general thrust and many specific policies contained within this element. Many of the strategies proposed for the County are exactly those used by the Conservancy and its joint-powers partners in practice. The County would benefit from adoption of these goals and policies County-wide.

The following addition would further strengthen the Conservation and Open Space Element:

Policy COS 7.6: Encourage agricultural activity in previously disturbed areas to reduce habitat loss.

The Open Space goals outlined in the draft plan are appropriate and beneficial. The Conservancy looks forward to partnering with the County in their implementation. Minor policy changes would increase specificity and effectiveness under Goal COS 19. First, in the Conservancy's experience, third-party conservation easements are a much more effective mechanism than deed restrictions for protecting open space. The Conservancy's joint-powers partners, including the DMCA and Mountains Recreation and Conservation Authority, are able to successfully enforce open space restrictions through this mechanism. Second, the County identifies multiple potential strategies that provide economic incentive for rural land conservation. The Conservancy is strongly supportive of innovative conservation strategies, such as Transfers of Development Rights (TDR). The plan should include specificity equal to or greater than the County's Draft General Plan regarding these programs, including implementation timelines. Additionally, the Antelope Valley Plan should state the County's intention to partner with the Cities of Palmdale and Lancaster to create an inter-jurisdictional TDR program encompassing the entire Antelope Valley.

The following policy revisions would address these points:

Policy COS 19.3: Allow large contiguous open space areas to be distributed across individual lots so that new development preserves open space while maintaining large lot sizes that are consistent with a rural environment, provided that such open space areas are permanently protected through conservation easements in favor of an open space agency or other entity acceptable to the County.

Policy COS 19.4: Pursue innovative strategies for open space acquisition and preservation through the land development process, such as Transfers of Development Rights, Land Banking, In-Lieu Fee Acquisition, and Mitigation Banking, provided that such strategies preserve rural character. Pursue partnerships with the Cities of Palmdale and Lancaster to establish inter-jurisdictional land conservation programs.

Renewable Energy Map Missing Key Wildlife Corridor

The draft Renewable Energy Priority Production Map does not include a wildlife corridor in the Vincent Grade vicinity that runs parallel to the Antelope Valley-Santa Clara River watershed boundary. This area is currently proposed to be included in the High Priority Zone, however it forms a critical narrow habitat linkage between development in Acton and the Palmdale urban area. Energy projects in this area must be carefully sited to avoid

Mr. Mitch Glaser, Supervising Regional Planner
Preliminary Draft Antelope Valley Area Plan
August 29, 2011
Page 6

severing this linkage. This area may not be appropriate for a High Priority Zone designation for this reason.

Conservancy Requests Changes to be Made Prior to DEIR

The above changes are minor in nature and complementary with plan's vision statement. Therefore, the Conservancy requests that they be made to the plan prior to conducting the draft environmental impact report (DEIR).

The draft Antelope Valley Area Plan is truly a landmark event in the sustainable future of the Antelope Valley. It changes course from decades of poorly managed growth and charts a path forward ameliorating the environmental effects of past decisions. The County deserves credit for advancing a community-based, environmentally sound vision for the Antelope Valley's development.

If you have any questions, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at (310) 589-3200, ext. 128.

Sincerely,

ANTONIO GONZALEZ
Chairperson

Attachment