



DESERT AND MOUNTAIN CONSERVATION AUTHORITY

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May 8, 2007

Daniel Fierros
County of Los Angeles Department of Regional Planning
Attn: Fairmont Butte Motorsports Park Project
320 West Temple Street Room 1348
Los Angeles, California 90012

**NOP Comments on the Fairmont Butte Motorsports Park Project Plan for Amendment
No. 02-176 and Parcel Map No. 26805**

Dear Mr. Fierros:

The Desert and Mountain Conservation Authority (DMCA) is a joint powers entity formed between the Antelope Valley Resource Conservation District and the Santa Monica Mountains Conservancy, State of California. The Fairmont Butte Motorsports Park project parcel is located in northern Los Angeles County in an area surrounded by visual and ecological significance to the people of Los Angeles County and to the State of California, warranting the utmost protection. The proposed motorsports project is amidst open space, much of which is designated as County Significant Ecological Area. A large block of State-owned (Conservancy) parkland is situated just south of the subject property.

The Initial Study accurately lays out the list of ecologically viable sensitive species and habitats on and around the property. However, the Initial Study is deficient for not recognizing that the project could result in significant biological and viewshed impacts. To minimize unavoidable significant adverse impacts to this property of Statewide significance, the Draft Environmental Impact Report (DEIR) must include several reduced-footprint project alternatives that provide decision makers with a meaningful range of development alternatives.

Biota

The proposed park project site is an area of rich biological diversity. Species such as the Desert tortoise and Mojave ground squirrel have historically occupied the site. A significant amount of raptor species, notably the California Condor, use the surrounding park property and potentially portions of the subject property. Any substantial development in or near open space Significant Ecological Areas (SEA) 57 and 60 would further fragment habitat found suitable for the Desert tortoise and Mojave ground squirrel.

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The Antelope Valley Poppy Reserve, Santa Monica Mountains Conservancy-owned Farimont Butte, and Broad Canyon comprise an integrated block of sensitive habitats. The Broad Canyon drainage channel should have at least a 500-foot-wide setback from any disturbance or structures. A site visitation survey done in May of 2003 prematurely concluded that no special-status plant species were found on the subject property. The DMCA strongly recommends that the proposed project site be surveyed a second time.

Wildlife Linkages

The Initial Study concludes that there are no wildlife corridors on the property. The DEIR, and each of its relevant alternatives, would be deficient if it does not address how wildlife does, and potentially could, move between SEA 57 to the north and west to SEA 60. The DEIR must analyze how development could impede habitat movement between SEA's 57 and 60. The DEIR must also include mitigation measures that reduce the levels of adverse impacts.

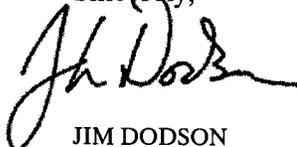
Habitat Buffer Alternative

The DEIR should include the following alternative. Significant adverse impacts to the SEA 57 habitat function would occur without a 500-foot-wide setback to the centerline of the Broad Canyon blueline drainage. This 500-foot-wide wildlife buffer must be 100 percent free of all grading, drainage infrastructure, lighting and non-native landscaping. This recommended alternative would also include a minimum 100-foot-wide natural land buffer along either the western or eastern project boundary to provide for north-south wildlife movement. The eastern boundary would provide for a shorter habitat linkage. However, the receptivity of land uses on the opposing side of Highway 138 may militate a more functional corridor on the western boundary. As part of this alternative, all of the designated buffer zone would be in highly restrictive conservation easement dedicated to the DMCA or a like public open space entity.

In addition, the alternative would include permanent deed restrictions over the whole of parcels 1 and 2 that prohibits them from being paved, lighted, or the placement of any permanent structures. Anything less than such a deed restriction would leave the site open to development and subsequent California Environmental Quality Act (CEQA) piece-mealing.

Thank you for your consideration of these comments. Please direct any questions and all future correspondence regarding this project to Paul Edelman of our staff at the above address and by phone at (310) 589-3200, ext. 128.

Sincerely,



JIM DODSON
Chairperson