



**DESERT AND MOUNTAIN CONSERVATION AUTHORITY**  
44811 North Date Avenue, Suite G  
Lancaster, California 93534  
Phone (310) 589-3200 • Fax (310) 589-2408

February 27, 2007

Christina Tran  
Impact Analysis Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Gorman Post Ranch NOP Comments  
Tentative Tract No. 062053**

Dear Ms. Tran:

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 proposed project is located in one of the most ecologically and visually significant areas in southern California. The Initial Study accurately lays out the long list of sensitive species and habitats on the property. 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.

The general welfare of the people of Los Angeles County and the State of California warrants only a project that absolutely maximizes the protection of ecological and visual resources. With the over 150,000 approved and proposed residential projects in the Fifth Supervisorial District, the need for north county high end housing cannot be an overriding consideration for numerous unavoidable significant adverse impacts.

The proposed project disturbance footprint would have a direct unmitigable adverse impact on approximately 70 percent of the 2,725-acre ownership. The minimum amount of grading would be 13,000,000 cubic yards. A project that is spread over two-thirds of the site and bisects the property with a contiguous north-south chain of development over 14,000-foot-long (2.6 miles) is not even close to a project that balances the public trust with economic gain. The property has been a County-designated Significant Ecological Area since the late 1980s. Any buyer or owner of the property has had ample exposure to the ecological and development constraints of the property. Those constraints include steep terrain to access the majority of the property. Piercing the ridgeline and canyon headwall with a major

access road that is fully visible from both major highways is not in any way within the public interest. The DEIR must include at least two development alternatives that stay within the canyon watershed boundaries on the portion of the subject property that abuts Gorman Post Road.

### **Proposed DMCA Alternative Project Footprint**

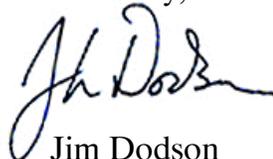
The DMCA requests that the DEIR include the following reduced project footprint. The attached 2006 aerial photograph shows a "Proposed DMCA Alternative Project Footprint." This footprint entirely avoids numerous watersheds and concentrates the development in the portion of the project closest to Gorman Post Road. The proposed total disturbance perimeter is shown around a 132 acre area with the exception of the proposed area for a waste treatment plant. We make the assumption that a waste treatment plant would be located in that most southerly location with any development proposal greater than 40 homes. The DMCA proposal is to contain all grading (including remedial grading) and fuel modification within this 132-acre footprint. The location of proposed structures within the 132 acres must be strategically sited to maximize their invisibility from both Interstate 5 and Highway 138. We realize this is a tough task.

To avoid the most sensitive ecological resources, and adequately reduce the visibility of the project from the two above stated highways, many acres of terrain within the 132-acre-area perimeter might have to remain undisturbed. The adjacent BLM inholding should remain free of utilities and brush clearance. However if the ecological and visual constraints within the subject 132 acres permit numerous residential units, then that bonus should be granted to the landowner. In this case, the assessment of visual constraints and impacts must include night lighting.

We recommend that all development alternatives include a fee simple open space dedication of not less than 2,300 acres to a public agency that transfers fully as a condition of map recordation. The DMCA would accept such a dedication.

Please direct any questions to Paul Edelman of our staff at (310) 589-3200 ext. 128.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Dodson". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jim Dodson  
Chairperson