



DESERT AND MOUNTAIN CONSERVATION AUTHORITY
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Agenda Item XIV
DMCA
10/23/14

September 29, 2011

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Senior Regional Planner
Los Angeles County
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, California, 90012

**Antelope Valley Area Plan Update
Notice of Preparation of a Draft Environmental Impact Report**

Dear Ms. Hua:

The Desert and Mountain Conservation Authority (DMCA), a joint powers authority of the Antelope Valley Resource Conservation District and Santa Monica Mountains Conservancy, works to protect open space and parkland in the Antelope Valley Planning Area. The DMCA commends the County for its visionary approach to resource management and land use planning that runs throughout the draft plan. The proposed planning framework, which 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 DMCA 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 DMCA wrote a detailed letter as part of the HDC project scoping in October of last year (attached) describing the project's potential impacts. Setting aside the merits of the project, the DMCA 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.

In the 2010 letter, the DMCA outlined 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.

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 DMCA 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 DMCA 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 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 2010 DMCA letter proposed a series of land use and acquisition mitigation measures that support the draft plan's vision of a mosaic of rural communities amidst an extraordinary environmental setting. The DMCA requests that the above paragraph be revised to restate the plan update's vision and narrow the scope of future expected changes to increasing economic opportunity within existing communities. The DMCA further requests that the 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 DMCA 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 DMCA 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 DMCA 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 DMCA strongly supports these policies and looks forward to working with the County to implement the Trails Plan. In the DMCA'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 DMCA 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 DMCA 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 DMCA 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 DMCA 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 DMCA's experience, third-party conservation easements are a much more effective mechanism than deed restrictions for protecting open space. The DMCA is 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 DMCA 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

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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.

DMCA Revisions Would Strengthen Plan Update

The above changes are minor in nature and complementary with plan's vision statement. The DMCA hopes they can be included as soon as possible to facilitate environmental review of the revised policies. The DMCA looks forward to review of the Draft Environmental Impact Report upon its availability.

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, Chief of Natural Resources and Planning, at (310) 589-3230, ext. 128.

Sincerely,

JIM DODSON
Chair

Attachment