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Town & Country Team
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012-3225

via email: tnc@planning.lacounty.gov

re: **Antelope Valley Area Plan Update**

To Whom It May Concern:

Thank you for the opportunity to comment on the Antelope Valley Area Plan Update progress. The Antelope Valley Conservancy has been unable to fully review the Draft Land Use Policies or Goals. These comments should not be construed as the sum of our concerns, nor should the absence of comment on an item be construed as agreement thereto.

1. **Renewable Energy.** In its discussion of renewable energy facilities, the Plan does not appear to incorporate the planning concepts of the Competitive Renewable Energy Zones (CREZ) or the Desert Renewable Energy Conservation Plan (DRECP). These should be incorporated.
2. **Native Landscape and Native Habitat.** “Native landscape” is not native habitat. The use of these terms in the Plan should be carefully reviewed. If development is approved to occur within native habitat, native landscaping of the same biotic community should be required.
3. **Wildlife Corridors.** The term “wildlife corridor” is appropriate only in the case of a studied and documented passageway used by wildlife to navigate difficult terrain or man-made obstacles. As illuminated by recent correspondence with the South Coast Missing Linkages scientists, shared with Department of Regional Planning and SEATAC, Antelope Valley is a *wildlife destination* for a wide variety of species and wildlife movement is widespread through the hills and across the valleys. The South Coast Missing Linkages maps cannot be used to determine the presence or absence of wildlife, and the lines thereon are place-holders, indicating that the entire area experiences wildlife movement.. Determination of wildlife presence, absence, or corridors would require specific studies conducted with appropriate methodology.
4. **Land Use Goals.** Even when land use goals have merit, without enforcement, evaluation, and fulfillment, goals are meaningless. Policy should prevent Specific Plans from nonconformance with the General Plan. Fulfillment of the Plans must be better enforced.

For example, the proposed Fairmont Butte Motorsports Park, Case No: 02-176, currently under environmental review by the County of Los Angeles Planning Commission, is proposed to be located in a remote rural community. By its need for zoning changes and Conditional Use Permits, the project admittedly does not conform to the General Plan, the Antelope Valley Area Plan, or the zoning of the area. The County’s Significant Ecological Area (SEA) Technical

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Advisory Committee finds the proposed project inconsistent with SEA provisions, due to its partial location within SEA 57 and incompatible uses for a contiguous site. The proposed project also violates County codified goals of promoting sustainability, ensuring resource and safety availability, and reducing sprawl, blight, non-native plants, and pollution. All of the goals and review policies are in place to prevent the approval of this project.

Yet, the project is recommended for approval by DRP staff. And, even though not yet approved, it was *included as an existing improvement on your Town and County maps*.

Local citizens were angered by those maps, and by having to fund lawsuits to get government to comply with its laws. At a recent Town and Country Team presentation, Thuy Hua said the role of a Plan is “so development won’t happen haphazardly or against the wishes of the community.” Yet haphazard sprawl and unwanted development are common. It is common practice for zoning to be changed arbitrarily, for codified goals to be ignored, for projects to be approved no matter how vile and nonconforming they are. This is why some citizens perceive environmental review as a sham and the hundreds of thousands of tax dollars spent on planning as a waste.

Antelope Valley Conservancy does not share that perception, and we value the effort that the Town and Country team members are making to incorporate meaningful enforcement and policies that could ensure fulfillment of the goals of the Plan. We encourage you to persevere.

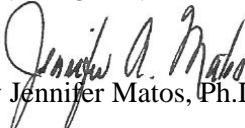
5. **Mitigation and Implementation.** The Town and Country Team has specifically asked for feedback in regard to mitigation and implementation. There is currently no system for mitigation or its intended outcomes to be enforced, measured, or punished if not implemented. It would be helpful for the County to *require mitigation to be implemented and fully funded before the project is allowed to break ground.*

Scott Harris, a Department of Fish and Game Biologist who serves on SEATAC, has informed us that DFG has no enforcement authority over mitigation, and Mr. Harris has been unable to identify one example of fulfilled mitigation in Antelope Valley. More typical is the Sanitation District of the County of Los Angeles, that described mitigation in its 2025 plan consisting of 150 acres Joshua tree woodland preservation; this has not been fulfilled. Hundreds of acres of Joshua tree woodlands bulldozed in documented violation of CEQA at Avenue L/55th Street West, destruction of hundreds more acres at 200th Street West/Avenue B that violated County grading permits, and even the burying alive of burrowing owls at 40th Street West and Avenue K have all gone unmitigated and unpunished.

Mitigation should be implemented and fully funded before a project breaks ground, and the County needs more staff biologists to analyze and monitor management of biological resources.

Thank you for your work on this project, and for considering our comments.

Respectfully Submitted,
by Resolution of the Board of Directors of
ANTELOPE VALLEY CONSERVANCY


by Jennifer Matos, Ph.D., Chairperson