

## SUPPLEMENTAL REPORT TO THE REGIONAL PLANNING COMMISSION

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DATE ISSUED:	November 13, 2023	
MEETING DATE:	November 15, 2023	AGENDA 7
		ITEM:
PROJECT NUMBER:	2019-002015-(1-5)	
PROJECT NAME:	Los Angeles County 2045 Climate Action Plan	
PLAN NUMBER(S):	Advance Planning RPPL2019003630 Environmental Assessment RPPL2019003635	
SUPERVISORIAL DISTRICT:	1-5	
PROJECT LOCATION:	Unincorporated Los Angeles County	
PROJECT PLANNER:	Iris Chi, Senior Planner ichi@planning.lacounty.gov	

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On November 15, 2023, your Commission will hold a public hearing to consider the Los Angeles County 2045 Climate Action Plan (“Project”). The Project will be the County’s plan towards meeting greenhouse gas emissions reduction targets for unincorporated Los Angeles County by the years 2030, 2035, 2045.

### **ADDITIONAL PUBLIC CORRESPONDENCE**

LA County Planning staff (“staff”) received eight comment letters since the supplemental report was submitted on November 9, 2023. On November 13, 2023, Staff received comment letters sent over the weekend from the following groups/individuals: Acton Town Council, Association of Rural Town Councils, Chris Duff, George Francisco, John Lloyd, FivePoint, Tom Grable, and Valley Industry & Commerce Association. See Exhibit S2-A for copies of correspondences.

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Report

Reviewed By:



Thuy Hua, Supervising Regional Planner

Report

Approved By:



Connie Chung, Deputy Director

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LIST OF ATTACHED EXHIBITS	
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EXHIBIT S2-A	Additional Public Correspondences
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## **EXHIBIT S2-A**

### **ADDITIONAL PUBLIC CORRESPONDENCES**

**From:** [Rafael Andrade](#)  
**To:** [Thuy Hua](#); [Iris Chi](#)  
**Cc:** [Connie Chung](#); [Edward Rojas](#); [Elida Luna](#)  
**Subject:** FW: Acton Town Council comments on the Climate Action Plan  
**Date:** Monday, November 13, 2023 7:08:25 AM  
**Attachments:** [ATC comments submitted Nov 10 2023 - SIGNED.pdf](#)

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Please see attached letter.

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**From:** Acton Town Council <[atc@actontowncouncil.org](mailto:atc@actontowncouncil.org)>  
**Sent:** Saturday, November 11, 2023 9:20 AM  
**To:** EDL-DRP BU-S Commission Services <[commission@planning.lacounty.gov](mailto:commission@planning.lacounty.gov)>  
**Cc:** DRP EPS Climate <[climate@planning.lacounty.gov](mailto:climate@planning.lacounty.gov)>; Acton Town Council <[atc@actontowncouncil.org](mailto:atc@actontowncouncil.org)>  
**Subject:** Acton Town Council comments on the Climate Action Plan

**CAUTION:** External Email. Proceed Responsibly.

Dear Chair Hastings:

Attached please find comments offered by the Acton Town Council on the Climate Action Plan. Please contact us at [atc@actontowncouncil.org](mailto:atc@actontowncouncil.org) if you have any questions or are unable to open the attached.

Sincerely;

Jacqueline Ayer

Correspondence Secretary



November 10, 2023

Honorable Michael R. Hastings, Chair  
Los Angeles County Regional Planning Commission  
320 W. Temple Street  
Los Angeles, CA 90012  
Electronic transmission of two 2 pages sent  
care of Commission Secretary Ms. Elida Luna at  
[commission@planning.lacounty.gov](mailto:commission@planning.lacounty.gov) and  
[climate@planning.lacounty.gov](mailto:climate@planning.lacounty.gov)

Subject: Acton Town Council Comments on the Final Climate Action Plan.

Reference: Notice of Public Hearing issued Saturday, October 14, 2023.

Dear Commissioner Hastings;

The Acton Town Council respectfully offers the following comments on the Final Climate Action Plan ("CAP").

The Acton Town Council Greatly Appreciates the Revisions Made to Measure E1:

In numerous comments that the Acton Town Council has submitted over the last 4 years pursuant to the CAP, we have expressed great concern regarding how building decarbonization strategies would adversely affect the many rural residents in unincorporated Los Angeles County that utilize propane or natural gas for heating and cooking purposes rather than electricity because they have unreliable electrical service due to weather (such as when the community of Three Points lost power for a week because of heavy snow), deficient utility service (such as when Clean Power Alliance customers lose power due to inadequate infrastructure), and other reasons. These concerns are now allayed because of changes incorporated in Measure E1.

The Acton Town Council Requests Clarification Regarding Action E5.1

In previous comments, the Acton Town Council explained that Measure E5 pertaining to graywater systems cannot be applied to rural areas that rely on septic systems; in response, staff indicated that Measure E5 merely encourages the development of gray water systems in new developments "but does not require their installation". However, the plain language of Action E5.1 states that dual waste piping is **required** in all new residential developments. The Acton Town Council respectfully requests that the Commission clarify this inconsistency before approving the CAP.

The Acton Town Council Greatly Appreciates the Revisions Made to Action E4.1:

We are grateful that staff heard the concerns voiced by the Acton Town Council and others regarding prior versions of Action E4.1 and made appropriate revisions.

The Acton Town Council Greatly Appreciates the Revisions Made to Strategy 9:

We are grateful that staff heard the concerns voiced by the Acton Town Council regarding the fact that, in some communities, agricultural uses and rural residential uses are one in the same and that Strategy 9 was revised.

Measure T6 Should Include a Prohibition on New Gasoline and Diesel Service Stations.

The purpose of Measure T6 is to “Increase ZEV Market Share and Reduce Gasoline and Diesel Fuel Sales” and according to the description, it is supposed to “Set targets for reducing total gasoline and diesel vehicle fuel sales”. However, Measure T6 does not include any Implementing Actions or Performance Objectives that address gasoline or diesel vehicle sales; it also fails to provide any policy or direction pertaining to gasoline and diesel vehicle sales. One obvious Action that should be incorporated in Measure T6 is to prohibit the development of any new commercial gasoline or diesel fueling stations (i.e., “gas stations”) in unincorporated Los Angeles County; such a prohibition is consistent with other CAP policies and it should be adopted.

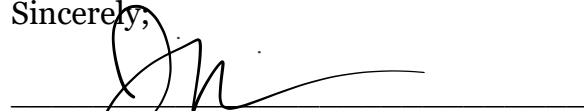
The Acton Town Council Requests Clarification Regarding Measure T5

In previous comments, the Acton Town Council explained that Measure T5 poses potentially significant safety impacts at sensitive intersections within the Community of Acton (such as at the intersection of Crown Valley Road and Sierra Highway). In response, staff assert that Measure T5 only applies to development in areas that are within one half mile of a major transit stop and that it therefore does not apply to the Crown Valley Road/Sierra Highway intersection (see page 2.3-139 of the PEIR). However, nothing in the CAP states that Measure T5 applies only to development within a half mile of a major transit stop so Measure T5 does indeed apply to the intersection of Crown Valley Road and Sierra Highway. The Acton Town Council respectfully requests that the Commission clarify this inconsistency before approving the CAP.

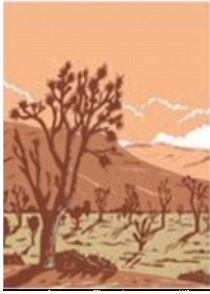
**CONCLUSION**

The Acton Town Council appreciates this opportunity to address the Regional Planning Commission, and we respectfully request that you address the two inconsistencies noted above and also consider a prohibition on of new gas and diesel stations in the CAP. If you have any questions or require additional information, please do not hesitate to contact us at [atc@actontowncouncil.org](mailto:atc@actontowncouncil.org).

Sincerely,



Jeremiah Owen, President  
The Acton Town Council



*Association of Rural Town Councils  
North LA County, Antelope Valley  
C/O S. Zahnter, Co-Director  
Lake Hughes, CA 93552  
[ourartc@gmail.com](mailto:ourartc@gmail.com)*

10 November 2023

SENT VIA EMAIL

Los Angeles County Planning Commission  
320 Temple Street  
Los Angeles, CA 90012

Honorable Commissioners,

Subject: Climate Action Plan 2045

The Association of Rural Town Councils has provided comments to Regional Planning's Climate Action Plan 2045 (CAP) through its previous opportunities for review. Rural communities will be most impacted by approval and enactment of the Plan's encompassing mandates. Rural residents are by and large the most independent, self-sufficient, "resilient," community-minded, and respectful of the natural environment at-large. However, the Climate Action Plan 2045 will benefit almost exclusively the urban South County, and cause real harm to rural residents of the North County. I have attached several letters submitted to Regional Planning for not only the CAP, but the OurCounty Sustainability Plan and other projects, expressly stating our concerns regarding the actions used to implement the Sustainability Plan to devastating effect on rural areas. Please consider our comments pointing to the egregious impacts upon our residents and within the context of "equity" across Los Angeles County—rural areas often consist of modest and low income residents, who often live without expectation of infrastructure and resources.

The race to affect climate change through a continuing onslaught of so-called "green" energy projects and carbon reduction has deeply affected rural residents, with the potential to cause even more impacts as the CAP will be implemented. However, the dangers posed to those living near these projects, like Battery Energy Storage Systems (BESS) targeted for rural communities on agriculturally zoned land and high fire hazard areas, include lithium ion battery fires so toxic, firefighters must avoid the extreme health risks of exposure to toxic chemical smoke, and let them burn, *Nothing* will stop thermal runaway. But rural communities will bear this abhorrently dangerous toxic brunt in addition to ongoing EPA unclassified particulate air pollution caused by current and projected additional massive solar project and RE development promoted by the Federal, State, and LA County governments, so urban residents can feel good about their "clean" energy usage, without knowledge or care for the impacts created by such development. Will there be large scale RE and BESSes in urban areas?

The danger that the CAP and Sustainability Plan seek to prevent is warming of the environment. Rural lands are important for carbon-storing resources, and when disturbed, release CO<sub>2</sub>; nothing in the CAP Final PEIR suggests preserving undisturbed or recovering agricultural lands or open space. Additionally, if glass and metal buildings and roofs produce "urban heat island effect," is it far-fetched to believe the

glass and metal covering tens of thousands of acres would create “solar heat island effect,” ([Photovoltaic Solar Heat Island Effect](#)) and further accelerate environmental heating of the Antelope Valley (AV) despite County efforts at reduction of CO<sub>2</sub> emissions? (I have personally evaluated the temperature of asphalt and the surface of a solar panel in July, and they both registered 130 degrees at 3,250 ft. elevation.) If the Sustainability Plan has underestimated the effect of renewable energy development (RE), and the heat produced by these projects, the AV will be hotter than even the Plan has predicted; then, RE development can predicate prevention of orographic rainfall reaching our mountain watershed areas and the AV basin, affecting the natural environment, lands used for self-sustaining food/livestock production, wildflower and open space tourism, and watershed resources so seriously reviewed by the LA County Water Plan, and the express action to obtain 80% of the county’s water from groundwater sources. This would be catastrophic for rural communities of the Antelope Valley, who also rely upon groundwater resources without the guarantee of water delivery as in urban areas with public water systems.

The cost involved for forced retrofitting of homes with all electric appliances is equivalent to stealing from homeowners whose homes were built according to required codes and ordinances in place at the time. Is this legal? Many rural residents earn modest incomes, or are retired on fixed incomes, and do not qualify for “incentives” or assistance in replacing appliances, or procuring alternative forms electricity production off-grid with petroleum based fuels. Furthermore, how will homeowners pay for the increasing cost of electricity that is dangerously unreliable? An all-electric 1,300 square foot home costs \$400 to \$500 a month to heat in winter, \$300 to cool in summer, and will cost much more in the future. Each Southern California Edison bill I receive contains a request to the CPUC for residential rate increases.

There is the matter of life and death when considering the elimination of petroleum-based fuel, i.e., propane, during extreme weather that coincides with loss of electricity and for days at a time in sub-freezing or excessively warm temperatures. Moreover, the use of small, gasoline-powered engines is an absolute necessity for many of our rural communities during Public Safety Power Shut-offs, weather-related loss of electricity--for heat, proper storage of food, pumping water from wells, and the maintenance of fire danger reduction around our homes. Many have invested thousands of dollars in generators, tractors, farm equipment, off-road transportation, and other tools necessary for health, safety, and self-reliance. Rural communities *must* have access to life-preserving petroleum fuels, generators, and tools to conduct life in the normally extreme conditions in the North County. The March 15th, 2022 Board of Supervisor’s motion directs that new county policies, ordinances, and code changes consider “the varying climate, geography, and infrastructure challenges that rural communities face.” In spite of this motion, the ARTC has not observed any specific actions/mitigations that address the difficulties imposed on rural residents by the CAP. *Massive* cumulative impacts of not only individual homeowner and business compliance, but large scale RE projects and BESSes that *will* be located in the rural areas of the AV must be considered in the Final PEIR—their commensurate environmental, quality of life, and economic impacts.

Respectfully,



Susan Zahnter  
Co-Director

Enclosures:

CC: Supervisor Kathryn Barger, Fifth District Planning Deputy Anish Saraiya, Fifth District Field Deputy Donna Termeer, Fifth District Asst. Field Deputy Charles Bostwick



Association of Rural Town Councils  
C/O Three Points-Liebre Mountain Town Council  
P.O. Box 76  
Lake Hughes, CA 93532  
661.724.2043  
[ourartc@gmail.com](mailto:ourartc@gmail.com)

5 July 2019

SENT VIA EMAIL

Mr. Gary Gero  
Chief Sustainability Officer  
Los Angeles County Chief Executive Office  
Kenneth Hahn Hall of Administration  
500 West Temple Street, Room 493A  
Los Angeles, CA 90012 [GGero@ceo.lacounty.gov](mailto:GGero@ceo.lacounty.gov)

Dear Mr. Gero,

The Association of Rural Town Councils (ARTC) appreciates the opportunity to comment on the Draft Discussion Plan (Plan) of the Los Angeles Countywide Sustainability Plan efforts. The Association of Rural Town Councils is comprised of fourteen member councils that represent rural communities across the unincorporated areas of Northern Los Angeles County. Originally formed to serve as a forum for rural residents, town councils seek to represent their constituents with regard to local, county, regional, and state issues, and provide an exchange for information regarding their governance. Each of our communities enjoys surroundings both diverse and unique to rural areas across the Antelope Valley.

A major concern is the lack of outreach to the North County—documents and announcements provided on the website indicate Sustainability Summits, Workshops, and Environmental Fair and Expo events were located in unincorporated urban areas of the south county, and none provided in the Antelope Valley. Outreach included “Workshops with nonprofits, the public sector, and private sector also covered transportation and land use, landscapes and ecosystems, waste and resource management, equity and resilience, and public health and air quality. Input received during these workshops will serve as the foundation for the draft “Our County” plan, which will be presented to the public during several Sustainability Summit events in early 2019 for further stakeholder engagement and feedback

before finalizing the plan in Summer” (<https://ourcountyla.org/news/industry-government-and-nonprofits-collaborate-to-shape-countywide-sustainability-plan>). The ARTC believes outreach to the north county citizens, including town councils, should proceed before any final plan is compiled and presented to the Board of Supervisors. Otherwise the plan risks its claim for “procedural equity,” which promotes principles to provide “inclusive, accessible, and authentic engagement and representation in processes to develop, or implement sustainability programs and policies” without actually performing such engagement or representation truly countywide (Our County Discussion Draft 12/190).

The ARTC observes this is an ambitious and far-reaching plan has the potential to change the General Plan, the Antelope Valley Area Plan, and other planning documents which guide development/land use patterns across the county, and while stating the Plan is not “regulatory”

or binding, its implementation will result in regulatory changes, seek compliance from all county departments, as well as accountability through review by your office. This especially concerns us, since some of our rural communities have existing Community Standards Districts (CSDs) documents inducted into Title 22, and many more are in process with Regional Planning at this moment. As you might know, CSDs allow our communities the ability to determine development density, how development occurs, how commercial development proceeds, determine how to preserve, maintain, and sustain our rural atmosphere and lifestyle, and all are unique to each of our many rural communities. Furthermore, uneven implementation and regulatory changes directed by the Plan might promote increased density, polluting industrial businesses, solid waste deposition, expanded mining operations, and industrial-scale renewable energy projects *here*, as “equity” is achieved in unincorporated urban areas; in turn, essentially producing a lack of “equity” *here*.

The Plan's “Goal 7: A fossil-fuel free L.A. County” is worrisome to rural residents and communities with regard to the promotion by federal, state, and local legislation; land use policies; and incentives to develop utility-scale renewable energy. Despite the general notion that the high desert is a “wasteland,” it is quite the opposite. The Audubon Society has designated the Antelope Valley a “Globally Important Bird Area” which supports avian life, as well as other flora (spectacular wildflower fields) and fauna with open fields, grasslands, riparian areas, chaparral, Joshua tree, juniper, pine, and oak forests; designated SEAs; and rapidly shrinking agricultural areas and windbreaks that provide nesting and forage for a variety of raptors; feed livestock, and people, too. Moreover, the county eschewed support for the non-regulatory California Department of Fish and Wildlife Antelope Valley Regional Conservation Investment Strategy designed to identify and implement long term conservation priorities that are threatened by suburban sprawl development and large solar facilities. Low-density development typically embraced by town councils tends to support conservation and preservation of natural landscapes as well as agriculture. ([www.wildlife.ca.gov/conservation/planning/regional-conservation](http://www.wildlife.ca.gov/conservation/planning/regional-conservation)).

Tens of thousands of acres in the Greater Antelope Valley have been converted to industrial utility-scale solar and wind turbine projects that surround rural dwellings, something our residents never imagined—and is perhaps an unintended consequence of “green” renewable energy development here in the the valley. How is this different from urban communities in the Los Angeles Basin which are impacted by quality of life issues and exposure to pollution and effects of industrial development? Similarly, the “green” energy produced here destroys wildlife habitat, spoils viewshed, promotes air quality issues (PM<sub>2.5</sub> and PM<sub>10</sub> dust particulates) affects home owners and residents, and could well be causing increased warming of the desert environment. Will the elimination of petroleum wells and refineries in the southern county mean these and other “dirty” industries will be placed in other areas of the county outside urban unincorporated areas? Will Los Angeles County import all its fossil-fuel products necessary for businesses and manufacturing, which will pollute other communities from which they come?

The Plan states, “Climate Change may also worsen existing inequities in county communities” (44/190). What has not been discussed is our own high desert environment. Studies are finding “solar heat island effect” resulting from solar facility development, while the county promotes its Cool Roofs Ordinance which does not consider the ultimate effect of many more thousands of acres of solar development needed to support a fossil-fuel free L.A. County as it intends conversion to 100% renewable energy. Ironically, this has the potential to cause accelerated climate change across our valley, with the desert becoming even warmer than predicted by the

Plan's "Projecting High Heat Days" Map (45/190). According to the map, "Climate projections predict that air temperatures will increase by 1.8°-7.2° F across the region with the greatest increases in average temperatures and high heat days (> 95°F) occurring in Palmdale, Lancaster, and the San Gabriel Valley." According to the projections, the northern reaches of the county will experience the largest area of highest temperatures. The darkest red area, with more than 100 days of > 95° F temperatures (2040-2060), consists of large areas targeted for solar energy production due to its proximity to the Tehachapi Renewable Transmission Project; the L.A. Department of Water and Power's Barren Ridge Transmission Project; its designation as a Desert Renewable Energy Conservation Plan Development Focus Area; solar project areas supported by City of Lancaster's Net Zero Policy, and embraced by the joint powers authority—Clean Power Alliance. This red area also encompasses rural communities and town council areas like Antelope Acres, whose environment has been transformed by the industrialization of agricultural lands, which will become warmer and suffer the results of so-called "green" energy that will help carry the urban unincorporated areas to a "fossil-fuel free" future. Accordingly, Action 31 should state *both* historic data and projection for weather and precipitation modeling be used to inform planning, infrastructure and community development processes. If only projections are used, how will they be ultimately determined true and correct, and proper course of action taken?

The Plan must consider solar heat island effect on not only Antelope Acres, but the entire unincorporated north county. This is described by environmental journalist Chris Clarke who writes, "At issue is the so-called "urban heat island" effect, in which human-made structures that absorb solar energy can significantly raise nearby temperatures. The effect holds true even when the setting isn't urban, as is the case with large remote desert solar installations. After all, the purpose of solar panels is to absorb as much solar energy as they can. About a fifth of that energy is turned into electricity under optimum conditions: the rest is released into the surrounding environment as heat ([www.kcet.org/redefine/solar-plants-may-make-deserts-too-hot-for-tortoises](http://www.kcet.org/redefine/solar-plants-may-make-deserts-too-hot-for-tortoises)). Moreover, a study published in the scientific journal article "The Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures," by Greg A. Baron-Gafford, et. al., found temperatures over a [Photovoltaic] plant were regularly 3–4 °C warmer than wildlands at night, which is in direct contrast to other studies based on apparently unproven models that suggested that PV systems should decrease ambient temperatures ([www.nature.com/scientificreports](http://www.nature.com/scientificreports)). Should the county and the Plan continue to promote large solar development, with the knowledge warming created by solar facilities will add to dramatic warming of the Antelope Valley?

"Our County's Landscapes and Ecosystems Briefing" states, "[c]ontinued demand for renewable energy resources driven by state and local energy policy suggests this trend may continue" (13). Action 27 should also require a solar heat island implementation plan and mitigation strategy that addresses temperature increases not unlike urban heat island effect—some residents have asked for a ban on large solar facilities. In addition, movement away from dependence on utility-scale solar projects at great distance from users should be facilitated by *requiring* distributed generation, and stopping utility-scale renewable energy projects on large swaths of real estate. The ARTC sees an energy security issue with this. Action 44 says, "Prohibit the conversion of working lands to residential uses, including farms and rangelands"—utility-scale solar energy,

then, should also be prohibited to preserve those lands (Plan 60/190). “Action” could also include “microgrids” for rural communities, so they are not at risk during “shocks” or emergencies, like other unincorporated communities.

If climate change projections are assumed correct, warming of the Antelope Valley will likely reduce rainfall in watershed areas that feed and maintain groundwater levels. Is there unanticipated additive effect of reducing recovery capability to the adjudicated basin while the county's population increases and utility-scale solar development is encouraged? Adjudication ushered in loss of agricultural production and concomitant renewable energy development. Will a joint powers authority (Action 38) for water management oversee the Antelope Valley Basin, as well as Sustainable Groundwater Management areas currently under local control? It is already projected 30,000 additional acres will go fallow, erode, and contribute to air quality issues also associated with construction and maintenance of solar projects with regard to particulate matter that not only carries the fungus that causes *Coccidioides immitis*, or Valley Fever, but also contributes to respiratory disease in adults and children, producing the worst rates in the county for asthma and COPD ( Los Angeles County Department of Public Health, Key Indicators of Health, 2017, 24/28).

Many of our rural communities were founded and thrived on agricultural production. It would be more encouraging to see “Action Items” that address water issues that would allow and encourage a resurgence of agriculture in some of our rural communities that embrace the business and the lifestyle. A vast portion of water in the county comes from imported sources, and the ARTC questions how promoting urban forests, parks, and more local urban food production be undertaken; and if it is, how water could be equitably distributed to Antelope Valley agricultural businesses and individuals interested in producing food, and add to our own local food production across the northern portion of the county. Rural residential areas, often comprised of large minimum lot sizes usually consisting of one, and frequently, several acres or more are enjoyed for their natural surroundings, and are often used for home-based businesses, including production of agricultural goods, equestrian use, care of livestock, and other animal husbandry.

The Plan's Strategy 3E endeavors to restrict development in high hazard areas, as evidenced by the timeline on page 70, whose “Targets” will eliminate discretionary development by 2025 and no new by-right development in high hazard areas by 2035. This appears in opposition to also proposing increased housing unit density in low density areas (low density is not defined, and would seem to include most town council areas outside of high hazard areas) offered by Action 43: “Pilot a land use tool that allows for duplex, triplex and secondary units in areas of low housing density,” and at the same time increasing density in urban areas—all in efforts to address the risk of development in high-hazard areas described as “those that are being exacerbated by climate change such as wildfires, flooding, extreme heat and sea level rise. Action 43 will eliminate development in coastal areas due to sea level rise, as well as floodplains, and high fire hazard areas. Low density rural town council areas could be targeted for multi-family, high density uses. How does this comport with the proposed By-Right Ordinance for streamlining multi-family residential development that would be allowed in any land use or zoning area that allows residential building, including zones A-1, and A-2? This runs counter to rural town council area CSDs that seek protection from suburban and urban development that will further

create the need for infrastructure investments that will increase costs the Plan claims rural communities divert from urban areas. When, in actuality, subdivisions and specific plan areas promoted by influential business interests, approved by Regional Planning and our Board of Supervisors, *directly and intentionally permit* sprawl, expose rural areas and natural resources to risk; require resources; supportive, protective, and infrastructure services that “[the county] could otherwise be investing in our existing [urban unincorporated] communities” (58/190).

Clearly, climate is not the only risk to high fire danger areas. It is well documented that 95% of wildfires are human caused (<http://www.preventwildfireca.org/OneLessSpark/>).

Discussion/action should include education and adequate enforcement of fire safety measures that address public interaction with National Forest and Monument Areas, state parks, SEAs, open space and conservation lands, preserves, county sanctuaries, and those that serve visitors to these recreation areas that often serve as watershed and cultural resource areas. Please provide a map with overlays that indicate high-hazard risk areas for not only fire, but extreme heat areas, floodplains, urban/wildland interface, earthquake fault zones, and sea-level rise areas, and identifies exclusion areas as well as target areas for higher density development. It also makes sense to exclude any Transit Oriented Districts from high hazard rural areas in order to maintain protections supported by CSDs that impose low density and building height restrictions.

Several of our town councils will be deeply impacted by the expansion of transportation infrastructure proposed across the Antelope Valley, including the High Desert Corridor, Northwestern Highway 138, and California High Speed Rail. Our roads become commuter routes to employment outside our area, and will likely become commuter routes to other transportation systems used mostly by residents outside rural areas. These projects will add to already dangerous conditions on existing roadways documented by Public Works' Vision Zero Plan. Additionally, and with regard to local transportation, we would like to share this comment the ARTC submitted to the Vision Zero Plan (22 April 2019):

The ARTC agrees with the County's efforts to reduce or eliminate traffic related fatalities on its roadways by 2035. Many of our council areas, with lower housing costs (compared to the South County), experience commuter traffic with residents leaving to employment outside the Antelope Valley (AV). Other council areas are further concerned with pedestrian, bicycle, and equestrian safety due to their proximity to freeway traffic exiting and directly entering their communities via State Route 14 and State Highway 138. Unlike our urban counterparts, we tend to have fewer pedestrians and bicyclists, but more commuters who travel long, straight, high-speed roadways; as well as long, winding roads inappropriately used as high-speed roadways. This translates to more high-speed collisions, which result in more deaths and serious injury attributed to automobile accidents, rather than auto/pedestrian collisions, and as your report indicates: “Higher vehicle speeds make avoiding a collision more difficult and can increase the severity of the collision . . . In addition, the faster a vehicle is traveling, the greater the stopping distance and the greater the force of the impact will be” (Vision Zero Draft Action Plan 20/76).

It could be as long as sixteen years before the Vision Zero Plan addresses traffic-related fatalities in the Antelope Valley, even though the Los Angeles County Public Health's document, “Key Indicators of Health 2017-Updated (KIH)” identifies “death rate attributed to motor vehicle crashes” (Age adjusted per 100,000 population) in Service Plan Area (SPA) 1 as the highest in

the county at 16.2 (KIH 23). This is just one example of difficulty in applying goals, policies, and plans designed for unincorporated urban areas to rural, low-density communities.

The ARTC has worked with Antelope Valley Air Quality Management District (AVAQMD) to assess air quality issues that differ, in part, from urban/suburban areas experiencing more automobile and industrial pollution. As previously mentioned, predictable drought, fallowing of agricultural lands, construction of thousands of acres of utility-scale solar facilities; urban and suburban development and construction; several large sand, gravel, and rock quarries; freight and passenger trains; a freeway and several major highways all contribute to increased PM<sub>2.5</sub> and PM<sub>10</sub> particulates which are further exacerbated by unique geology and geography, highly variable meteorological conditions, and regular sustained winds (AVAQMD/ARTC CARB CCAP Proposal 31 July 2018). Ambient particulate is directly responsible for the sharp rise and highest incidence of Valley Fever diagnoses in Los Angeles County, since the fungal spores are distributed through exposure via direct contact with soil, or through wind-driven dust events (<http://rx.ph.lacounty.gov/RxCocci0717>). Other KIH show respiratory disease “Health Outcomes” in the Antelope Valley that meet or exceed all other SPAs across the county. The AV has the highest childhood asthma rate; and the highest COPD/emphysema mortality rates. Comparing other SPAs Health Outcomes with the AV, SPA 1 fares worse, and exceeds SPAs 2 through 8 for mental health, overweight, diabetes, cardiovascular disease, unintentional drug-related death, and cancer. All cause mortality tops all other areas of Los Angeles County, even those urban unincorporated communities and neighborhoods surrounded by industrial pollution and high traffic automobile pollution (KIH 25). The high levels of ill health associated with living in the Antelope Valley indicate opportunity for improvement through the Plan.

The ARTC has questions regarding the Plan and California Environmental Quality Act, since its goals and strategies involve regulatory actions that will not only change how county departments function and comply with sustainability objectives, goals and strategies, but propose change to Regional Planning documents like Antelope Valley Area Plan, and the General Plan. Our concern regarding CSDs—ordinances specific to each rural town or community area are presumably under scrutiny for changes required by sustainability regulations. Land use plans, increased density and housing plans, creating walkability, creating areas for active transportation, will impact some communities more than others, especially when uneven regulatory imposition occurs, like the proposed Inclusionary Housing Ordinance that *excludes* the entire Third District, and parts of the Fifth District (Inclusionary Housing Ordinance Sub-Area Maps).

Before the plan states that rural, or low density areas are a drain on resources that could be better used in existing communities, think about this: The AV's rural areas are targeted for solid waste facilities—53 percent of the capacity of the Antelope Valley Landfill, and approximately 37 percent of Lancaster Landfill is accounted for by the City of Los Angeles (Countywide Waste Management Plan 2017). Our rural areas provide tons of construction aggregate materials, cement plant products, and accept tons and tons of organic waste from the City of Los Angeles and urban areas in the form of compost and mulch (often full of trash) distributed on our open land. North county areas are targeted for thousands of acres of industrial-scale solar facilities that have and will change quality of life for residents near them. Lower cost housing has invited



many who could not afford homes in the LA Basin to live in the Antelope Valley, and often in rural communities. These areas also provide services to millions of visitors from outside the area seeking respite and recreation in the San Gabriel Mountains National Monument, Angeles National Forest, Vasquez Rocks, Pacific Crest Trail, State of California Poppy Reserve and other vast wildflower fields, Saddleback Buttes State Park, State of California Indian Museum State Historic Park, Devil's Punchbowl County Park and other parks, preserves, numerous County Sanctuaries, and much more.

The ARTC agrees that “equity in sustainability policies and programs can be achieved only if a diverse, representative mix of residents are involved in development, implementation and management. Communities can help to make sustainability programs more equitable where those programs incorporate their localized and lived experiences, histories and perspectives” (138/190). However, as mentioned, outreach to rural communities was deficient, and we recommend rural community involvement before the Plan is finalized. The association includes town councils which formed twenty-seven years ago, many others have also been guiding and representing their communities for twenty years or more; volunteering countless hours to better the lives of their constituents, and welcome any effort or support to promote safety, health, and well being. We look forward to participating in development of an “inclusive and accountable governance structure,” and “engagement guidelines and processes aimed at building trust and strengthening relationships with the diverse communities that make up Los Angeles county, involving residents in decision-making processes at all levels (Strategy 11A). We would appreciate any future developments involve town councils. Trust, transparency, and openness will go a long way.

Most sincerely,



Susan Zahnter  
Director

Copy to: Honorable 5th District Supervisor Kathryn Barger ([Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)); Chris Perry; Planning & Public Works Deputy to Supervisor Barger ([CPerry@bos.lacounty.gov](mailto:CPerry@bos.lacounty.gov)); Donna Termeer; Senior Field Deputy to Supervisor Barger ([DTermeer@bos.lacounty.gov](mailto:DTermeer@bos.lacounty.gov)) Charles Bostwick; Assistant Field Deputy to Supervisor Barger ([CBostwick@bos.lacounty.gov](mailto:CBostwick@bos.lacounty.gov)) Susan Tae; Department of Regional Planning ([stae@planning.lacounty.gov](mailto:stae@planning.lacounty.gov))

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30 April 2020

SENT VIA EMAIL

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Dear Ms. Baldwin,

RE: March 2020 Climate Action Plan Public Review Draft

The Association of Rural Town Councils (ARTC) appreciates the opportunity to comment on the Climate Action Plan (CAP) Draft dated March, 2020. Thank you, and the Los Angeles County Sustainability Office, for extending the public comment period so more input can be included in revising the CAP. The ARTC understands a greater portion and weight of this plan is concerned with more densely populated and industrialized areas of unincorporated Los Angeles County. However, our councils and their constituents recognize the plan will affect rural communities in different ways than their urban counterparts with regard to production of “green” renewable energy, elimination of fossil fuels, greenhouse gases, disposal of waste and compostable materials, air quality, and ultimately, the health and well being of residents, and natural environments.

“GREEN” RENEWABLE ENERGY

We continue to have concern for the CAP promotion of so-called “green” energy, or as mentioned in the plan, renewable energy (RE). Antelope Valley (AV), which includes unincorporated Northern Los Angeles County (Fifth District), Eastern Kern County, and City of Lancaster, has seen a dramatic increase in the installation of industrial-scale solar projects, as well as industrial-scale wind turbine development. According to documentation of approved, under construction, and built projects, the best estimate of acreage consumed by wind energy and solar projects covers 113,239 acres! Compare this number to acreage comprising the other supervisorial districts. AV renewable energy covers land area equal to 72% of the First District; 109% of the Second District; 41% of the Third District; and 39% of the Fourth District. This provides some visual perspective of the sheer scale of renewable energy and its spacial distribution. Granted, the AV *is* spacially larger, but impacts are very real to rural residents becoming surrounded by such industrial development. “Green” energy is delivered from vast distances to urban residents and businesses separated from both immediate and long-term ill effects, who believe RE is the answer to energy issues, and who do not see the environmental destruction and rural community impacts caused by such development, and do not necessarily equate its industrial impacts as equal to those experienced in urban/suburban areas.



As the ARTC posited, in its letter dated July 5<sup>th</sup>, 2019, addressing Los Angeles County's Sustainability Plan: "Tens of thousands of acres [113,239] in the Greater Antelope Valley have been converted to industrial utility-scale solar and wind turbine projects that surround rural dwellings, something our residents never imagined—and is perhaps an unintended consequence of "green" renewable energy development here in the valley. How is this different from urban communities in the Los Angeles Basin which are [also] impacted by quality of life issues and exposure to pollution and effects of industrial development? Similarly, the "green" energy produced here destroys wildlife habitat, spoils viewshed, promotes air quality issues (PM<sub>2.5</sub> and PM<sub>10</sub> dust particulates) [leading to detrimental health outcomes], affects home owners and residents, and could well be causing increased warming of the desert environment." Our concerns are further weighted by the possibility of aggressive actions proposed by the CAP to reduce greenhouse gas emissions (GHG) and carbon neutrality by 2045 that essentially cancel the proposed "co-benefits" of such actions that do not promise our constituents "healthy, livable, and equitable communities" should utility-scale renewable energy development continue unabated in the AV (CAP 8).

A 100% RE powered county is concerning to rural residents and communities with regard to its continued promotion by state and local legislation; land use policies; and incentives to develop utility-scale renewable energy. Despite the general notion that the high desert is a "wasteland," it is quite the opposite. The Audubon Society has designated the Antelope Valley a "Globally Important Bird Area" which supports avian life, as well as other flora (spectacular wildflower fields) and fauna with its open fields; grasslands; riparian areas; chaparral; Joshua tree, juniper, pine, and oak forests; designated SEAs; conservation areas, county sanctuaries, and rapidly shrinking agricultural areas and windbreaks that provide nesting and forage for a variety of raptors, and also supports livestock and people. Moreover, the county eschewed support for the non-regulatory California Department of Fish and Wildlife's and Desert and Mountain Conservation Authority's "Antelope Valley Regional Conservation Investment Strategy" designed to identify and implement long term conservation priorities that are threatened by suburban sprawl and large RE projects, and refrained from extending more stringent Significant Ecological Area (SEA) protections to the Antelope Valley identical to those that protect SEAs in the south.

How do urban Clean Power Alliance electricity users feel about the destruction to AV's natural areas and resident wildlife exchanged for supposedly "green" sprawling solar and wind RE facilities? The CAP's statement that "The County's participation in the Clean Power Alliance (CPA), and commitment to sourcing 100% renewable energy for its electricity supply by 2025, will enable this shift and ensure a low-carbon energy future" (CAP 10). One must ask, then, how is the remote location of wind/solar energy, transported more than 100 miles to CPA's 32 jurisdictions and 3 million customers, supported by substations and massive transmission tower networks subject to serious regional disruption, and threaten increased fire danger in extremely high fire hazard areas as well as suburban communities, an accomplishment for the county? Can the county and its residents feel good about RE when they understand the effects to their neighbors to the north? Just as importantly, can distributed generation, in five years, supply the balance of CPA's needs to meet its 100% RE goal? Satisfaction of this goal should be sourced, going forward, entirely by distributed generation, whose footprint does not require further destruction of natural areas or agricultural lands, or threat to rural communities' character and well being.

#### FOSSIL FUEL FREE LOS ANGELES COUNTY

The ARTC expresses its concern for the plan's efforts at a fossil fuels-free county, and in particular, the item indicating the transition to all-electric dwellings. "This reduction is achieved by replacing spaceheating, water heating, and cooking appliances in *existing* (emphasis added) residential and commercial buildings and by promoting all-electric new construction" (CAP 114). How will residents

and landlords pay for costly electrician services to wire millions of existing gas-using dwelling units for electric stoves and furnaces, and will this drive up rental cost increases prohibited by rent control? The huge monetary cost to single family residences from this changeover, and likely forced through codified ordinance, cannot be justified by the small 4% GHG cost identified in the CAP's Appendix A (101). Many rural communities must rely on propane gas delivery for heat and cooking. Electricity is currently quite expensive for heating homes during extremely cold temperatures—typically well below freezing in winter—and are common in the high desert, mountain, and valley rural communities. The Los Angeles Basin rarely sees freezing temperatures, and we question the plan's assumption that everyone in the county can afford expensive “green” energy to heat/cool homes, cook, and pump water from their wells. A modestly sized 1,300 square foot all-electric house in a mountain community currently costs \$400 to \$500 per month to power and heat in winter; and conversely, \$300 to \$400 per month to power and cool during summer temperatures commonly above 100 degrees. Costs for electricity continue to rise, and if climate change warming projections in the AV are fairly accurate, it will be among the hottest areas of the County, and homes will be oppressively expensive to cool, as well as heat.

Furthermore, these communities can be without electricity for days at a time during major weather events like snow storms, heavy rain, and high winds, or SCE's public safety power shut-offs—which inhibit cell phone and internet service communications in those times of emergency. Back-up generators (if residents can afford one) must run on propane, gasoline, or diesel fuel to power homes and pump water. The CAP states, “*The County will use the tools at its disposal to ban the sale of small gas-powered equipment*” (emphasis added), require the use of zero-emission or near-zero-emission equipment for County projects and contracts, and work with the air quality management districts to encourage similar practices across the unincorporated County” (CAP 60). Without a generator or propane kitchen stove, many residents would not be able to easily heat water or cook food during power outages. Do not prohibit use of small engines for electricity generation or propane/ natural gas stoves and furnaces. Rural communities are often last in line to have power restored during outages, and accordingly, want and need to maintain to the greatest extent possible—self-sufficiency, which ultimately reduces services needed from the County, and makes *us* more “resilient.”

Are agricultural lands and residences exempt from these requirements? The CAP indicates “no.” Banning the sale of small gas-powered equipment is explicit. However, as of yet, we do not know of readily available, reasonably priced battery powered electric tractors, all-terrain vehicles, log-splitters, portable welders, and other power equipment commonly used for maintenance, construction, weed control, and fire safety on rural lands. According to the CAP, 1% of Greenhouse Gas Emissions come from agricultural sources (CAP 7). So, targeting these sources of emissions to save 1% could cause hardship for many rural residents who might operate agricultural businesses or attempt to maintain their properties.

Additionally, fossil fueled power generating plants are necessary for adequate electricity production during lapses inherent in delivery of wind and solar energy. At this time, battery storage has some potential to provide some relief at rather great cost to homeowners and businesses; but questions regarding safety of lithium ion battery storage units and their specific requirements, which, when ignored have the potential to combust, is of further concern not only in extremely high fire hazard areas, but should be in urban and suburban areas as well (<https://www.solarpowerworldonline.com/2020/02/just-how-concerned-should-the-solar-industry-be-about-battery-fires/>).

In observance of fairness, we suggest assistance to rural residents for *essential* fossil fuel usage, similar to incentives received by buyers of electric cars and other electric appurtenances promoted for cleaner air; and especially if fuel supplies ***are banned***, or decrease, prices rise, and carbon credit purchases increase costs. What will happen if CAP and county ordinances ***prohibit*** use of fossil fuels? Hardship will ensue for all residents. Federal, state, and local incentives for electric vehicles range from \$8,500 to \$12,500, depending on income levels. Allow residents to sell more excess energy without penalty to electricity companies. Allow businesses and homeowners to produce more than the minimum allowed by SCE to add more power to the grid. Net metering through Southern California Edison (SCE) gives homeowners “credits” on their bill, not cash. If residents were paid reasonably for electricity they are producing, it is likely more residents and businesses would install systems that would actually pay for themselves and provide far more electricity to the grid without impacts produced by utility-scale renewable energy.

### CLIMATE CHANGE

The ARTC refers to an excerpt from its previously mentioned letter responding to the OurCounty Sustainability Plan Draft, 2019, concerning climate change and our north county environment, which states:

“Climate Change may also worsen existing inequities in county communities” (44/190). What has not been discussed is our own high desert environment. Studies are finding “solar heat island effect” resulting from solar facility development, while the county promotes its Cool Roofs Ordinance which does not consider the ultimate effect of many more thousands of acres of solar development needed to support a fossil-fuel free L.A. County as it intends conversion to 100% renewable energy. Ironically, this has the potential to cause accelerated climate change across our valley, with the desert becoming even warmer than predicted by the Plan's “Projecting High Heat Days” Map (45/190). According to the map, “Climate projections predict that air temperatures will increase by 1.8° -7.2° F across the region with the greatest increases in average temperatures and high heat days (> 95°F) occurring in Palmdale, Lancaster, and the San Gabriel Valley.” According to the projections, the northern reaches of the county will experience the largest area of highest temperatures. The darkest red area, with more than 100 days of > 95° F temperatures (2040-2060), consists of large areas targeted for solar energy production due to its proximity to the Tehachapi Renewable Transmission Project; the L.A. Department of Water and Power's Barren Ridge Transmission Project; its designation as a Desert Renewable Energy Conservation Plan Development Focus Area; solar project areas supported by City of Lancaster's Net Zero Policy, and embraced by the joint powers authority—Clean Power Alliance. This red area also encompasses rural communities and town council areas like Antelope Acres, whose environment has been transformed by the industrialization of agricultural lands, which will become warmer and suffer the results of so-called “green” energy that will help carry the urban unincorporated areas to a “fossil-fuel free” future.

The Plan must consider solar heat island effect on not only Antelope Acres, but the entire unincorporated north county. This is described by environmental journalist Chris Clarke who writes, “At issue is the so-called “urban heat island” effect, in which human-made structures that absorb solar energy can significantly raise nearby temperatures. The effect holds true even when the setting isn't urban, as is the case with large remote desert solar installations. After all, the purpose of solar panels is to absorb as much solar energy as

they can. About a fifth of that energy is turned into electricity under optimum conditions: the rest is released into the surrounding environment as heat” ([www.kcet.org/redo/solar-plants-may-make-deserts-too-hot-for-tortoises](http://www.kcet.org/redo/solar-plants-may-make-deserts-too-hot-for-tortoises)). Moreover, a study published in the scientific journal article “The Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures,” by Greg A. Baron-Gafford, et. al., found temperatures over a [Photovoltaic] plant were regularly 3–4 °C warmer than wildlands at night, which is in direct contrast to other studies based on apparently unproven models that suggested that PV systems should decrease ambient temperatures ([www.nature.com/scientificreports](http://www.nature.com/scientificreports)). Should the county and the Plan continue large solar development with the knowledge warming created by solar facilities will add to dramatic warming of the Antelope Valley? “OurCounty's Landscapes and Ecosystems Briefing” states, “Continued demand for renewable energy resources driven by state and local energy policy suggests this trend may continue” (13). Action 27 should also require a solar heat island implementation plan and mitigation strategy that addresses temperature increases not unlike urban heat island effect—some residents have asked for a ban on large solar facilities. In addition, movement away from dependence on utility-scale solar projects at great distance from users should be facilitated by *requiring* distributed generation, and stopping utility-scale renewable energy projects on large swaths of real estate.

Warming projected for the AV from GHG will be complicated by “solar heat island effect.” In turn, this could further increase likelihood of reduced rainfall in watershed areas that feed and maintain groundwater levels, and perhaps prove the unanticipated additive effect of reducing recovery capability to the adjudicated basin while the county’s population increases and utility-scale solar development is encouraged. Water supply is a very serious issue for rural residents who are served by small water companies or have their own wells. Certainly, the indirect effects of “green” energy should be considered and addressed in the CAP, which were ignored in the “Cool Roofs Initiative.” It is not difficult to ascertain the heating effects of essentially 32,880 acres of glass and metal from built solar projects, especially in 100 degree plus heat in AV’s late spring, summer, and early autumn. As reported above, in KCET’s article by Chris Clarke, “about a fifth of that energy is turned into electricity under optimum conditions: the rest is released into the surrounding environment as heat.” If Los Angeles County persists in ignoring “solar heat island effect,” please prove it does not exist. Accordingly, the ARTC challenges the CAP to include restrictions for utility-scale renewable energy development here, and fully embrace distributed generation to meet all future local electricity needs and cool our high desert, and also the unincorporated urban environment via reduction in gas powered energy.

### AIR QUALITY

The ARTC has worked with Antelope Valley Air Quality Management District (AVAQMD) to assess air quality issues that differ from urban/suburban areas experiencing more automobile and industrial pollution, and disproportionately affect AV residents. The AV experiences particulate pollution from predictable drought, fallowing of agricultural lands, construction of thousands of acres of utility-scale solar facilities and transmission infrastructure accessed by dirt roads; urban and suburban development and construction; several large sand, gravel, and rock quarries; freight and passenger trains; a freeway and several major highways all contribute to [not only increased GHG] increased PM<sub>2.5</sub> and PM<sub>10</sub> particulates

which are further exacerbated by unique geology and geography, highly variable meteorological conditions, and regular sustained winds (AVAQMD/ARTC CARB CAPP Proposal 31 July 2018, found at the website link below:

[https://ww3.arb.ca.gov/db/search/google\\_result.htm?q=ARTC+AVAQMD&submit.x=0&submit.y=0&which=arb\\_google&cx=006180681887686055858%3Abew1c4w18hc&srch\\_words=&cof=FORID%3A11](https://ww3.arb.ca.gov/db/search/google_result.htm?q=ARTC+AVAQMD&submit.x=0&submit.y=0&which=arb_google&cx=006180681887686055858%3Abew1c4w18hc&srch_words=&cof=FORID%3A11)).

Erosion of fallow farmland contributes to air quality issues also associated with construction and maintenance of solar projects with regard to particulate matter that not only carries the fungus *Coccidioides immitis* that causes Valley Fever, but also contributes to respiratory disease in adults and children, producing ***the worst rates in the county—worse than urban residents exposed to more industrial and transportation related pollutants***—for asthma, COPD, for lowest birth weight, highest infant death rates, coronary heart disease death rate, and highest death rate for strokes in African Americans *and* all other residents, as well as the highest total death rate in the county, more than all other service plan areas (Los Angeles County Department of Public Health, Key Indicators of Health, 2017, 22-24).

The CAP Co-Benefits Assessment asked these questions: “Could this improve outdoor air quality in communities that have been historically harmed by exposure to pollution?” and “Could this reduce incidences of asthma and respiratory and cardiac disease?” (CAP, Healthy, Livable, and Equitable Communities, Appendix C, 122). Some strategies for decreasing CO<sub>2</sub> for urban areas are identified: reducing emissions via increase in urban forests; use of cool pavements and roofs; increase in number of parks in high-need urban areas; and imposing 100% RE use across the county for transportation and industry. The AV answers: “Key Climate Actions” for the Antelope Valley Planning Area should include goals for measurable reduction in particulates PM<sub>2.5</sub> and PM<sub>10</sub>. Our recommendations include strategically placed additional Beta Attenuation Air Quality Monitors in order to officially classify EPA and CARB attainment levels for particulates—there is only one in the AV, placed in downtown Lancaster; a moratorium on utility-scale renewable energy in favor of distributed generation; moratorium on new large transmission tower infrastructure (and related dirt access roads), windbreak and rural community tree planting, preservation of native and listed native trees, preservation of natural vegetated areas and recovered farmland, and finally, restoration of abandoned or fallow agricultural lands with native vegetation through a proper restoration plan to preserve soil, create habitat, and prevent continued erosion and entrainment of soil particulates into the air.

## MULCH

For the past four years the ARTC has fielded complaints from rural residents regarding the delivery of odorous, trash-filled mulch, made from green waste collected in Los Angeles, and delivered to various locations around the Antelope Valley. Problems with mulch have angered neighbors and residents who experience blowing trash, odors from yards and fields, and what they feel has been a lack of response or enforceable recourse to their plight. According to recent changes to California State Law, mulch can contain up to 0.5% of trash by weight, including paper, glass, metal, and plastic. Formerly, 1% trash by weight was allowed, which can also be a significant amount. Plastic film cannot comprise an amount more than 20% of the total amount of trash in testing samples. The trash is not considered “illegal dumping;” so, clean-up cannot be enforced by local statutes. We have learned City of Los Angeles residents place trash in their green waste containers, which ends up shredded at various composting facilities in the LA Basin, then is targeted for the AV for spreading on open lands.

Uncounted tons of trash-filled mulch have been delivered to our high desert. Often, so much is delivered and spread that it completely covers shrubs and vegetation on recovering agricultural fields; it is often spread on fields that are not active agriculture operations as a form of weed abatement; unverified reports claim payment is made to individuals willing to receive mulch. As it slowly decomposes, *producing additional CO<sub>2</sub>*, trash becomes exposed and blows onto neighboring properties, and along roads and highways. Some residents leave large piles and berms that are at risk for spontaneous combustion. New State regulations hold residents who receive mulch responsible for its cleanliness, and must present lab test results to Public Health officials if they receive complaints. If residents do not request ‘passing’ lab results from delivery drivers, they risk becoming responsible for expensive removal of mulch to a hazardous waste facility, if it is determined to fail test parameters for heavy metals, bacteria, or trash. Not surprisingly, “allowed amounts” still leach into soil and run-off can eventually contaminate waterways, ephemeral streams, and groundwater. How will our rural communities be protected? Has the CAP accounted for the GHG emissions that will increase in the AV as more mulch is spread over many years?

Rural residents who live in extremely high fire hazard areas are most at risk for spontaneous combustion of mulch, as well as other sources of ignition. Fires that start in mulch require lengthy amounts of time and resources to extinguish, which in an area of usual high-wind events, can pose real danger of spread. We have seen mulch fires supposedly put out, only to continue smoldering and start again, requiring firefighters to turn over and water large areas of the material to assure it is completely extinguished.

Another particularly egregious insult to rural areas in addition to fire danger, is mulch contaminated with non-native invasive plants and insect pest species that could spread to active agricultural lands, protected lands such as the State of California Poppy Reserve, Federal forest lands, numerous County Sanctuaries, privately held conservation lands, and of course, private properties. Currently, the town council community of Green Valley is infected with the Gold-Spotted Oak Borer, which has caused the destruction of numerous oak trees and threatens elimination of the area’s ‘iconic’ oak forest. It is suspected contaminated firewood was transported into Green Valley, but it could easily have been mulch. This spells a significant loss to the massive ecosystem support oaks provide, and is described on the SEA Program’s website: “The Oak Tree (*Quercus*) is an iconic tree of the LA County landscape. The Oak tree is a keystone species in a complex ecosystem, providing habitat for 5,000 insects, 80 species of reptiles and amphibians, 100 species of birds, and over 60 mammals!” (<http://planning.lacounty.gov/site/sea/2018/04/05/oak-tree/>).

The CalRecycle website provides a list of “threats” that can be spread by distribution of contaminated green waste and mulch, and warns: “More than 76,000 farms and ranches in California produce more than 400 different crops worth more than \$50 billion annually, the most of any State. Fully one third of the nation’s vegetables and two thirds of its fruits and nuts are produced here. Unfortunately, this prosperity is threatened by an increasingly large and varied group of imported pests which carry tree-killing diseases or render fruits and vegetables inedible. Some of these pests threaten agriculture, while others attack iconic native species [like oak trees and canyon sycamores]. To prevent or slow the spread of pests, local, federal and state agriculture officials conduct trapping, eradicate pests [if possible] when found, and enforce quarantines” (<https://www.calrecycle.ca.gov/organics/threats>).

The ARTC agrees “Preserving and supporting the unincorporated County’s forests, parks, and working lands is essential for reducing climate change impacts, as well as protecting the communities, economies, and ecosystems that depend on the land,” (CAP 12). Many of the proposed CAP mitigations and strategies sound positive, and there is no doubt many of them will contribute a great amount toward promoting and creating “healthy, livable, and equitable communities.” However, the ARTC requests that

mitigations and strategies that are currently more focused on unincorporated urban setting, be reconsidered for unintended consequences and impacts to rural town council areas and communities of the Antelope Valley, and that recommendations in this letter be taken seriously and further implemented in the CAP. This is crucial to the health and well being of the residents of the AV who suffer more ill health outcomes than any service plan area in the County; crucial to preservation, cleanliness, and adequate supply of water resources; crucial to air quality; and preserving the ability of our high desert, mountain, and valley communities to remain resilient in the face of increased demands on our valuable natural ecosystem resources.

Sincerely,

A handwritten signature in black ink, reading "Susan Zahnter". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Susan Zahnter  
Director



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1 February 2022

SENTVIA EMAIL

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Thuy Hua, Supervising Regional Planner  
320 West Temple Street, 13th Floor  
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[climate@planning.lacounty.gov](mailto:climate@planning.lacounty.gov)

Dear Ms. Hua,

**Subject:** Notice of Preparation of a Program Environmental Impact Report and Public Scoping Meeting  
for the Los Angeles County 2045 Climate Action Plan

The Association of Rural Town Councils (ARTC) appreciates the opportunity to comment on the revised Climate Action Plan (CAP) component of the General Plan's Air Quality Element. The ARTC commented on the March 2020 CAP, and continues to experience concerns regarding the implementation of target reductions in greenhouse gases and the ultimate goal of carbon neutrality by 2045, and how implementation will affect rural communities of the Antelope Valley (AV).

Firstly, there are references to "Draft 2045 Climate Action Plan" which is nowhere to be found on any Regional Planning websites or pages. In fact, the Initial Study (IS) states, "The Draft 2045 CAP includes 11 overarching strategies and 26 measures, each of which has multiple implementing actions (GRAs)." This has caused confusion because there is no 2045 plan to reference, and alludes to the Draft 2045 CAP having been completed, with the Initial Study fashioned around the 2045 Draft Plan. If the NOP and IS include evaluation of the Draft 2020 CAP, then it must be indicated in this effort, and time extended for additional evaluation and opportunity for comment.

Page one of the IS states, "Implementation of the Draft 2045 CAP, once approved, would occur throughout unincorporated Los Angeles County in all zoning designations." This is particularly concerning when considering the statements provided by Ms. Kristin Pawling of the Chief Sustainability Office during the March 2020 CAP Webinar, which indicated the 2020 plan—because of jurisdictional issues could only be imposed upon unincorporated areas of the County, but the office would like all 88 cities outside county jurisdiction to participate voluntarily in order to reach the OurCounty Sustainability Plan goals, and the County would exhibit "climate leadership." Ms. Pawling described the Plan as "aspirational, but informs "direct action at the county level," and "many targets in the CAP are directly informed by the Sustainability Plan." Furthermore, she stated the Green House Gas (GHG) Emissions Inventory that evaluated current levels of GHG were "largely countywide" (Webinar 15:36-25:20). This means a large contingent of the County's population, producing GHG, will not be legally bound by the CAP or the Sustainability Plan goals. This also means the 2045 CAP GHG reduction goals' impacts will disproportionately affect many unincorporated and rural communities. The 500,000 Antelope Valley residents will bear the largest burden of proposed GHG measures, informed by an inflated Emissions Inventory that will most benefit the south county, and jurisdictions that do not partake in the CAP efforts.



## AESTHETICS

The ARTC and other town councils have submitted many letters and participated in public hearings regarding the placement of utility-scale renewable energy projects that cover thousands of acres of rural lands surrounding our communities. It is clear from our experience that the drive to “net-zero” carbon emissions has come at the expense of rural communities and other populations at large in the AV. The IS discusses ordinances already in place that would address any visual impacts created by implementation of the Draft 2045 CAP, i.e., the Hillside management Ordinance, which states, “[C]omponents of the County Code that relate to the protection of Hillside Management Areas would ensure that the scenic character of ridgelines and hillsides would be preserved. As most of the scenic vistas in LA County are available from hillsides and ridgelines, compliance with the Hillside Management Areas Ordinance would ensure that visual impacts from scenic vistas would be reduced” (11). However, *all* of the solar projects in the AV have been built on the valley floor. Moreover, if one believes that the General Plan Policies cited in this section on aesthetics has actually preserved and enforced GP/Antelope Valley Area Plan goals and policies driving (AVAP) CUP actions related to visual impacts mitigation agreed to by solar projects, then you are mislead. Supplied below are photographs that are representative of what happens to our scenic vistas when utility-scale renewable energy and transmission towers are built to transport renewable energy to the LA basin. Hillside management will not reduce view impacts from hillsides and ridgelines.



View looking north from Land Veritas Mitigation Bank (2016) CA Aqueduct at 110<sup>th</sup> St. West

Environmental Impact Reviews often state similarly, that there are no significant impacts to scenic areas, as thousands of acres of chain link and barbed wire fencing intrude on the open spaces of recovering agricultural lands, as industrial commercial projects are incongruously thrust into rural areas and communities. The road transecting the two solar projects on the left has been identified for years as a Scenic Highway in the General Plan’s Scenic Highway Element 1974, and most recently in the Antelope Valley Area Plan’s Scenic Drives Map 4.2.

Below are three additional photographs showing an instance of detrimental, and likely permanent visual impacts from construction of AV Solar Ranch 1.



Before AV Solar Ranch 1, Fairmont



After the construction of AVSR 1, note the chainlink and barbed wire fencing, impermeable to ground dwelling wildlife.





The Silverado Project area, pre-construction, 110<sup>th</sup> St. West, Avenue K, TRTP and Barren Ridge Transmission lines in background. (2014)

During the construction of the Silverado Projects, as mitigation, a portion of the county-designated “Poppy Trail” was created, with fabulous views of the finished solar project, also visible from the State of California Poppy Reserve. Mitigation which certainly does not include preservation of the wildflower fields destroyed to construct the project.

Many of the RE projects currently built are along scenic routes identified in the AVAP, with inadequate mitigation for impacts created by these projects. Also, explain how the REO has protected viewshed piecemealed, project by project. Drive across the Antelope Valley for a first person look. There is very real potential for implementation of the CAP Plan to open the floodgates for thousands more acres of utility-scale solar projects. For the IS to claim less than significant impacts from the implementation of the CAP Plan is disingenuous, especially with incentives offered by the county and the federal governments, and especially by the hundreds of thousands of acres of solar necessary for current and future “fossil fuel free” LA County. The ARTC requests this be reconsidered and impacts identified as significant and explored in the Environmental Review. The mandate to bring the county into a carbon neutral state with 100 percent renewable energy will, as mentioned, be perpetrated at the expense of rural communities, residents, and natural environments across the AV, which often provide great economic benefits to local businesses.

Several times in the NOP, under various headings, the statement is made: “The Draft 2045 CAP does not include specific proposed development, and it would be speculative to guess where any specific future development might be proposed in furtherance of Draft 2045 CAP goals. For the reasons discussed . . . this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.” The ARTC disagrees, and posits that the policies for the decarbonization, including streamlined review under the PEIR as stated under the “Background” heading, describes a “new development review consistency checklist to allow projects to streamline CEQA compliance for their projects by using the CAP, per CEQA Guidelines § 15183.5”(3). Furthermore, “The Draft 2045 CAP could also indirectly incentivize

the development of solar facilities in rural areas (such as the Antelope Valley), where they could be more visible from roads, trails and other at-grade elevations” (15). There is nothing indirect about this 2045 CAP. It is forthright in discussing policy efforts, strategies and measures, and eliminating GHG. The AV has already, and continues to be targeted for renewable energy with federal incentives; Bureau of Land Management and public lands policies; California’s Renewable Energy Portfolio and executive orders; California’s Desert Renewable Energy Conservation Plan; the county’s REO; SCE and LA Water & Power transmission and renewable energy projects; Joint Powers Authority Clean Power Alliance; City of Lancaster’s Net Zero Program; 2045 CAP’s Measure E1: Procure Zero-Carbon Electricity and Measure E5: Increase Renewable Energy Production; and the streamlining and incentives directed to projects through this ordinance via the CAP PEIR are the only proof needed to determine the designation of the AV as the place to build utility-scale renewable energy. How many utility-scale projects have been built in the south county?

### AGRICULTURE AND FOREST

For several years, the ARTC has promoted the preservation of agriculture, as food source, as a way to improve air quality, and preserve important habitat. The water adjudication finalized in 2016 spelled a notable decline in agricultural development, and essentially took water from farmers to guarantee water for residential and commercial development, and seems to have provided a set-up for the proliferation of utility-scale solar projects.

As noted in the IS, there is little specially designated farmland. However, farm fields of the AV have provided not only food for people and livestock, but a haven for migratory birds traveling the Pacific Flyway which feed and nest in open fields, cultivated or not. The Audubon Society has designated the AV as an Important Bird Area, part of its list of places of worldwide importance. Worldwide, a coalition of organizations including the America Audubon Society has identified over 8,000 IBAs or Important Bird Areas.

The purpose of the IBA Program is to set “science-based” priorities for habitat conservation to “promote positive action to safeguard vital bird habitats.” According to the Audubon’s IBA website, “IBA inventories provide a scientifically defensible method for prioritizing conservation activities and allocating limited conservation dollars to ensure the maximum benefit to birds.” A subset of these 8,000 sites has been given the higher status of “Globally Important Bird Areas.” These 424 worldwide sites have special status due to “global conservation concern” (<http://web4.audubon.org/bird/iba/>). One of these 424 areas is in Los Angeles County, in the Western Antelope Valley. This site, the Antelope Valley Important Bird Area provides breeding, foraging and nesting habitat for Swainson’s Hawk, Golden and Bald Eagles, Northern Harriers, Burrowing Owls, Le Conte’s Thrasher, Tricolored Blackbirds and other sensitive species, including the California Condor. Describing this IBA, the Audubon Society states that, “The grassland bird community is most impressive in winter, when large numbers of raptors concentrate in the area. Large flocks of Vesper Sparrows, Horned Lark and Mountain Bluebirds also occur here, widely extirpated elsewhere in the Los Angeles area. The agricultural fields, especially alfalfa, are productive year round. Winter brings Mountain Plover, whose flocks are among the last in southern California. After wet winters, nesting grassland species like Northern Harrier linger well into spring, and occasionally even breed. Swainson’s Hawk maintains its southernmost breeding outpost in the state here. As this IBA lies in the path of a major spring migrant route for songbirds, these windbreaks can host hundreds of vireos, thrushes and warblers during April and May.”

Furthermore, IBAs are indicators of wide biological value for many species of flora and fauna. Again quoting the Audubon society, “Our data demonstrates that IBAs are also excellent indicators of biodiversity richness and are therefore also important for a wide range of species.” This globally

important IBA is now threatened by what has been called an "alternative energy gold rush." The Antelope Valley IBA, rimmed by the Angeles Forest, the Tehachapi Mountains and year-round wetlands along the San Andreas Fault, is already home to AV Solar Ranch I, one of the largest solar plants in the world. Without a comprehensive plan in place to provide adequate mitigation for the foraging areas, i.e., loss of open, formerly agricultural lands, that will be lost due to alternative energy development, this biologically important area will be obliterated piece by piece until a tipping point is reached and threatened species like Tricolored Blackbirds, Burrowing Owls and Swainson's Hawk disappear from this area forever. The IS states:

Implementation of Draft 2045 CAP GHG reduction measures that involve ground disturbance could, depending on the location, result in the conversion of farmland to non-agricultural use. *For most types of development projects that may be proposed in furtherance of Draft 2045 CAP goals, construction is anticipated to occur primarily within developed areas such as parking lots, improvements to existing structures, and urban areas near public transportation.* However, other types of new projects encouraged by Draft 2045 CAP measures could occur in previously undeveloped areas such as facilities to increase waste diversion or renewable energy. *Measure E1: Procure Zero-Carbon Electricity and Measure E5: Increase Renewable Energy Production could result in the development of photovoltaic solar or other renewable energy generation facilities in undeveloped areas, which development could result in the conversion of farmland to a non-agricultural use.*

The ARTC argues that "most types of development" will occur in developed areas might be true, but particular large-scale projects allowed on A-2 zoned lands will likely occur in the AV, such as waste facilities, or open areas for waste diversion, or renewable energy. The AV already receives millions of tons of trash-filled green waste in the form of mulch, spread across fields that previously provided habitat for birds and other species reliant on our open fields for forage and nesting. For some reason, the decomposition of such waste is not considered a pollutant or a cause of significant impact and is promoted by our state and county. In addition, large mulch berms are used as a visual shield to obscure views of illegal marijuana growing operations. They are also a fire hazard, and are quite difficult to extinguish once ignited—ironically, no impact option is chosen in the IS.

It is also interesting that the IS states, "as a general matter, forest land would not be suitable for the implementation of actions in furtherance of the Draft 2045 CAP. For example, solar energy generation requires access to sun; forested areas do not provide that resource and would not be deforested to serve a solar energy generation use." While forested areas would not be deforested, and environmental impact study in the IS is not warranted, the anticipated influx of solar energy projects would, in fact, destroy tens of thousands of acres in the quest to achieve net-zero energy; it is repeatedly stated that this will not be addressed by the PEIR, whose subject is promotion of renewable energy. There will be significant impacts to "agriculturally zoned" lands.

Preservation of rural character is important to many rural town council areas, since many arose out of agricultural activity during the nineteenth and twentieth centuries. The 2045 CAP might not propose land use designations that would require zone changes. Unfortunately, zone change and a nearly blanket conversion of A-1 to A-2 during the development of the Antelope Valley Area Plan opened the door for ease in imposing utility-scale renewable energy upon rural residents, and all the destruction—including visual and scenic impacts, air quality issues, and lost biological value.

## AIR QUALITY

The ARTC has had continuing concerns regarding air quality in the AV. It has been such a concern that the ARTC collaborated with the AVAQMD to submit a State of California Community Air Protection Program grant request in 2018 (enclosed). While there are many sources of particulate pollution in the AV, the introduction of utility-scale renewable energy has contributed mightily to an ongoing dust particulate problem; along with sand, rock and gravel production; fallow agricultural fields (lack of water); further sources of particulate pollution include two major highways, freight and passenger rail lines, and commercial/industrial activities.

The AV is an air quality nonattainment area for PM<sub>10</sub>. Over the past ten years, residents in communities of the AV have experienced increasingly unhealthful air and property destruction akin to the Dust Bowl era of the 1930s and resulting threat of pulmonary illness. Predictable drought, water adjudication, diminishing agricultural activity, and renewable energy development have proven dust control measures and “Best Management Practices”(BMPs) like Antelope Valley Air Quality Management District's (AVAQMD) Rule 403, unsuccessful in preventing fugitive dust.

Fugitive dust can affect “sensitive receptors”—children, asthmatics, the elderly, those with pulmonary disease, cardiovascular disease, as well as the general public at large, because it can carry the spores of *Coccidioides immitus*—better known as Valley Fever. Failure of dust control plans puts residents all over the Antelope Valley at risk for this fungal infection, which can impose large public costs in lost productivity, disability, and healthcare. This concerns residents every time a utility-scale solar project is proposed. Since the AV is an air quality non-attainment area for PM<sub>10</sub>, this leaves the question of whether current non-attainment of air quality levels of particulates combined with projects previously mentioned, plus Centennial, the National Cement Plant, and reasonably foreseeable massive solar and wind development will bring attention from the United States Environmental Protection Agency.

Because of cumulative effects of other utility-scale solar construction and operations, we see the need for expanded monitoring across the AV, through additional monitoring stations nearer to sources of pollution, with more encompassing, accurate quantification and analysis of Antelope Valley air quality to determine levels of PM<sub>10</sub> and PM<sub>2.5</sub>. These actions are necessary to protect the health and well being of not only rural residents, but all residents of the AV.

The ARTC and other entities have repeatedly commented on air quality issues and the public health implications that are detailed in LA County Public Health Indicators 2018. The AV has the highest childhood asthma rate in the county, along with cardiovascular death rates, and low birth weight. This is a serious public health issue that must be evaluated in environmental impact review.

## BIOLOGICAL RESOURCES

Many letters have been submitted on a variety of renewable energy projects that have impacted the natural environment, for which mitigation has proved insufficient. There are also many other impacts associated with biological resources related to renewable energy and various other development activities. The IS states, “There are currently no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved state, regional, or local habitat conservation plans in effect in unincorporated Los Angeles County. Therefore, no impact would occur.”

Conveniently, there are no *adopted* conservation plans in LA County. However, the County declined to support the State of California Fish and Wildlife's Antelope Valley Regional Conservation Investment Strategy, even though it is non-regulatory. There are issues with wildlife movement, and fragmentation of conservation land, which individual EIRs for projects are allowed to perpetrate. Regional Planning allows projects to set aside part of their development sites for conservation purposes, which are not connected to any other conservation lands, corridors, etc., Lacking are documented monitoring and evaluation of the success or failure of mitigation efforts for not only "Biology" concerns, but all of the issues discussed throughout this letter and listed in the IS. Biologist and raptor expert, K. Shawn Smallwood, of U. C. Davis, has also commented on the lack of monitoring and enforcement for conditions of approval for renewable energy projects, including the West Antelope Solar Project:

It has long been known that mitigation pursuant to CEQA has often either failed or has not been implemented, but with no consequences to the take-permit holder (Silva 1990). There should be consequences for not achieving mitigation objectives or performance standards. The project proponents should be required to provide a performance bond in an amount that is sufficient for an **independent party** to achieve the mitigation objectives originally promised, and in this case, the promises should be much more substantial. A fund is needed to support named individuals or an organization to track the implementation of mitigation measures. Report deadlines should be listed, and who will be the recipients of the reports. In my professional opinion . . . lack of specific monitoring details renders [ environmental review] inadequate and uncertain and makes it impossible to gauge whether to what extent any mitigation measures will lessen potentially significant impacts on species. If these measures are not clearly laid out . . . then there will be no basis to determine that impacts will be less than significant once implemented. Furthermore, without adequate funding allocated in advance, there is no certainty that any proposed mitigation will actually take place.

Unfortunately, solar fields in the Antelope Valley destroy foraging areas and habitat for what Audubon has identified as a "Globally Important Bird Area." Non-native grassland and recovering vegetation provide cover, nesting, and foraging for indigenous and migratory waterfowl, song birds, and raptors alike, some of which are special status species. Air quality in the Antelope Valley has caused the highest incidence of respiratory disease in Los Angeles County according to their Health Department publication "Key Indicators of Health 2017." Many residents have stated their opposition to solar development, fearing respiratory disease and valley fever, which is ignored. It is more important to become net-zero and provide popularized feel-good "green energy" than be concerned about residents' health. This green energy touted by the State of California, Los Angeles County, and the City of Lancaster, to reduce electrical generation carbon emissions, is misleading. The costs include not only public health issues, but also real estate--desert environments that the Bureau of Land Management says could take 3,000 years to recover; the carbon exchanging qualities of undisturbed desert soils; the industrial pollution and carbon created by mining, processing, and manufacture of solar panels (in China, not in our backyard)--all produced with fossil fuels; difficulty recycling panels and its energy costs; inefficiency of solar electricity production; and industrializing our rural desert communities.

There are documented instances of destruction by sPower of an occupied Red Tailed Hawk nest, and Red Dawn Sunpower, LLC's wholesale removal of 95.44 acres of Joshua Trees of which 63.86 acres were within the Joshua Tree SEA #60 (unfortunately before their protected listing by CDFW).

## HAZARDOUS MATERIALS

The ARTC requests that the PEIR evaluate the release of hazardous materials related to solid waste disposal, renewable energy projects—including battery storage facilities, organic waste processing facilities, sewage and/or mulch spreading operations, etc. The North County possesses large areas considered for Areas Potentially Suitable for Siting Alternative Technology Facilities in Los Angeles County (<https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>).

## UTILITIES AND SERVICE SYSTEMS, ENERGY

Implementation of the 2045 CAP would promote the construction of energy transmission, which has been instrumental in the ignition of fires during high wind events and have caused the most destructive fires in California history. Areas that are targeted for transmission rights-of-way are stretched across miles from the source of energy production; fine examples exist from the AV to the South County—Barren Ridge Transmission Project, and the TRTP. The areas traversed are put at great risk of fire, and include our rural communities, many of which are in Very High Fire Hazard Zones. PSPS reduces our communities' ability to remain resilient in the face of fire danger through loss of ability to pump water for personal use, for fire suppression, and to communicate during these outages. Please evaluate significant impacts to our communities from related risk of additional transmission that will be required for the achievement of net zero emissions mandated by the 2045 CAP.

Perhaps foremost among concerns is the “Fossil Fuel Free LA County.” Retrofitting buildings—our homes with all electric appliances would also reduce rural residents' ability to maintain and protect our lives and property in the event of power failure. We are often last to receive repairs to services, and we know we must remain independent, and really, present prime examples of resilience touted by the OurCounty Sustainability Plan. Taking away fuel sources for pumping water, for warmth and cooking in the extreme weather conditions predominant in the AV is a very, very significant impact, and must be evaluated in the PEIR.

Respectfully,



Susan Zahnter  
Director

CC: Supervisor Kathryn Barger, Planning Deputy Anish Saraiya, Senior Field Deputy Donna Termeer, Assistant Field Deputy Charles Bostwick



Association of Rural Town Councils  
C/O Three Points-Liebre Mountain Town Council  
P. O. Box 76  
Lake Hughes, CA 93532  
[ourartc@gmail.com](mailto:ourartc@gmail.com)

26 February 2017

VIA EMAIL & HAND DELIVERED

Lancaster City Council

Mayor R. Rex Parris  
Vice Mayor Marvin Crist  
Council Member Raj Malhi  
Council Member Ken Mann  
Council Member Angela Underwood-Jacobs  
Lancaster City Hall  
44933 N. Fern Avenue  
Lancaster, CA 93534

Dear Mayor Parris, Vice Mayor Crist, Council Members Malhi, Mann, and Underwood-Jacobs,

Subject: S-Power Projects Appeal, Conditional Use Permits 16-02, 16-07

The Association of Rural Town Councils (ARTC) is comprised of member councils in unincorporated Northern Los Angeles County, originally formed to serve as a forum for rural residents and councils to participate in state, regional, county, and local issues, as well as an exchange for information regarding their governance. Each of our “unique” communities enjoys a rural lifestyle, and seeks to preserve the enjoyment of country living, which includes owning livestock, animal and crop husbandry, open space, wildlife, and essentially, small town living.

However, it has come to our attention that the rural town council area of Antelope Acres faces especially difficult challenges associated with proliferation of utility-scale solar electrical generating plants throughout their community. They occupy an unusual position, in that their boundaries are infiltrated by irregularly placed properties annexed by the City of Lancaster. They provide an exemplar of why our Los Angeles County Local Agency Formation Commission would be prohibited by state law today to approve such irregular annexation, and further amplifies the difficulties associated with political and jurisdictional boundaries and effects to neighboring areas.

There is concern regarding the cumulative effects associated with not only the proliferation of utility-scale renewable energy projects in Los Angeles County unincorporated areas, neighboring Kern County, and City of Lancaster, but other large infrastructure projects, including High Desert Corridor, Northwestern Highway 138 (4,000 acres), and California High-Speed Rail (unknown properties affected in Antelope Valley (AV), more than 2,000 along the route). Los Angeles County Regional Planning's (LACoRP) Renewable Energy web pages identify 5,752 acres of predominantly approved solar projects. Our best effort at tabulating only solar projects in southeastern Kern County, pending and complete, total 22,374 acres. Not including wind energy projects, the total acreage of approved and pending solar projects is 28,126 acres, within both counties in the Mojave Desert Air Basin. There is no easily obtainable published list or map of utility-scale solar projects in Lancaster to consider in determining cumulative effects of this industrial-type construction on air quality and quality of life for Antelope Acres residents. More and more, these become environmental justice concerns relating to socio-economic factors, public

health issues, and quality of life that must be discussed with special regard to development of industrial utility-scale renewable energy in rural communities, and constitute significant impacts usually explored by full environmental impact review.

Our attention turns to one of the most important of those factors--public health. Antelope Valley is an air quality non-attainment area for PM<sub>10</sub>. The project area in question has historically been farmed and restored unsuccessfully with regard to soil erosion, leaving residents exposed to fugitive dust and its health implications. Over the past five years, residents in communities of the AV have experienced increasingly unhealthful air and property destruction akin to the Dust Bowl era of the 1930s and resulting threat of pulmonary illness. Predictable drought, water adjudication and diminishing agricultural activity, and renewable energy development have proven dust control measures and "Best Management Practices" (BMPs) like Antelope Valley Air Quality Management District's (AVAQMD) Rule 403, unsuccessful in preventing fugitive dust. One might argue that avoidance of soil disturbance, regular watering, soil stabilizers, and revegetation measures can adequately mitigate erosion and fugitive dust. However, AVAQMD Director Brett Banks' comments regarding Los Angeles County Silverado Projects, Final Environmental Impact Review Response letter, dated February 14<sup>th</sup>, 2014, state: Daily PM<sub>10</sub> thresholds may be exceeded in a three hour wind event of 30 miles per hour with 20 acres of [unstable] Disturbed Surface. ***High Wind Conditions are a regular occurrence in Antelope Valley.*** Watering frequency for the projects is estimated at two times per day. When water is used as fugitive dust control, watering is required three times a day and increased to a minimum of four times a day if there is evidence of visible Wind-Driven Fugitive Dust AVAQMD Rule 403-Fugitive Dust (11)(d). . . The projects propose replanting a vegetated cover of native grasses for mitigation of fugitive dust and erosion processes. Successful fugitive dust control and site stabilization would result in maintaining vegetation to the highest extent possible. Revegetation in desert environments is extremely difficult with 80 percent failure rates seen as typical, even with supplemental irrigation.

Site stabilization has been unsuccessful in the past, and in the case of these projects, the site is bereft of native vegetation capable of preventing soil erosion, and revegetation failure rates prognosticate continued cycles of renewable energy development and future drought, which will produce the same results. Fugitive dust can affect "sensitive receptors"—children, asthmatics, the elderly, those with pulmonary disease, cardiovascular disease, as well as the general public at large, because it can carry the spores of *Coccidioides immitis*—better known as Valley Fever. Failure of dust control plans put residents all over the Antelope Valley at risk for this fungal infection. Distance from the source of dust is of little consequence when attempting to identify sensitive receptors near projects, since winds can carry dust borne spores hundreds of miles and affect *anyone*. The previously mentioned Silverado Solar Projects EIR identified few sensitive receptors nearby, but failed to explain any fugitive dust can be carried for hundreds of miles, as evidenced by the notable 1977 Bakersfield dust storm, which sent spores aloft and "several hundred cases as far north as Sacramento and the San Francisco Bay were identified" (<http://kerncountyvalleyfever.com/what-is-valley-fever/complications/>). More fugitive dust means more risk; residents nearby are more at risk. Traditional soil stabilization with water and/or chemical applications and AVAQMD's Rule 403 have consistently proven inadequate in containing fugitive dust across the Antelope Valley as pertains to utility-scale solar development. As of yet, no dust control measures required by Los Angeles County Regional Planning or the AVAQMD have adequately addressed this problem. Furthermore, the United States Environmental Protection Agency may require New Source Review Construction permits, and describes how new major stationary sources of pollution and major modifications to existing sources need to obtain an air pollution permit before commencing construction. This process is called new source review (NSR) and is required whether the major source or modification is planned for an area where the NAAQS are exceeded (nonattainment areas) or an area where air quality is acceptable (attainment and unclassifiable areas).

Permits for sources located in attainment areas are referred to as Prevention of Significant Deterioration (PSD) permits, while permits for sources located in nonattainment areas are referred to as non-attainment area (NAA) NSR permits (NSR Program, Parts C and D of Title 1, of CAA; US EPA letter to the DRECP, EIR/EIS, dated February 23<sup>rd</sup>, 2015.)

Problems presented by this particular solar project symbolize only some of the variety of unresolved, unsuccessfully mitigated issues. One of the most important is the lack of successful dust control plans which adds to and complicates a serious, ongoing public health issue with regard to Valley Fever, and sensitive receptors like children, elderly, and those with respiratory and pulmonary conditions. Due to the cumulative effects of other concurrent solar construction and operations, fallowing of water adjudicated agricultural lands in the area, and reasonably foreseeable impacts of other projects we see the need for expanded monitoring across the communities near sources of pollution, and yearly quantification of AV air quality impacts to determine the ability of other projects to be permitted. These actions are necessary to protect the health and well being of not only rural residents, but all residents of the AV.

These projects' division and destruction of rural communities contributes to loss of property values and adds to the violation of citizens' investment in and enjoyment of their private properties, which has been caused in part by annexation intrusions in and around Antelope Acres. There is also the popular but mistaken assertion that "previously disturbed" agricultural land is deficient in value for anything but solar projects and contributes to neighboring communities like Antelope Acres to see a need for a comprehensive environmental and community based plan, working in conjunction with project proponents and the city, that recognizes the economic value of not only their private property, but its connectivity to open space, and one that values the natural environment that contributes to the desirability of living in the Antelope Valley, as well as its attraction to neighbors and visitors alike that bring business to the area. Cumulative impacts from thousands of acres of projects, particularly within and adjoining the City of Lancaster, and in Los Angeles and Kern Counties are overlooked, and must be acknowledged in full environmental review.

Finally, it is concerning that the "environmental fees" collected by the city for its mitigation account, whose plans are not available to the public or interested agencies during the environmental review process, makes it impossible to determine their adequacy in mitigating specific impacts to this rural community and the natural environment at large. We request that you agree with the appeal, deny the Conditional Use Permit for these projects, until such time full environmental review, mitigations, and environmental fees are determined by Antelope Acres residents to be adequate in protecting their properties, their lifestyle, and their health.

Sincerely,



Director

Copy to: City of Lancaster Associate Planner Jocelyn Swain, Fifth District Supervisor Kathryn Barger, Fifth District Antelope Valley Field Deputy Donna Termeer, 21<sup>st</sup> Senate District Field Representative Andrew Awad, 36<sup>th</sup> Assembly District Field Representative George Andrews

**From:** [Rafael Andrade](#)  
**To:** [Thuy Hua](#); [Iris Chi](#)  
**Cc:** [Connie Chung](#); [Edward Rojas](#); [Elida Luna](#)  
**Subject:** FW: LA County Climate Action Plan - need for an economic impact analysis  
**Date:** Monday, November 13, 2023 7:05:10 AM

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Please see letter received.

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**From:** myvoice@oneclickpolitics.com <myvoice@oneclickpolitics.com>  
**Sent:** Friday, November 10, 2023 9:23 AM  
**To:** EDL-DRP BU-S Commission Services <commission@planning.lacounty.gov>  
**Subject:** LA County Climate Action Plan - need for an economic impact analysis

**CAUTION:** External Email. Proceed Responsibly.

Re: LA County Climate Action Plan - need for an economic impact analysis

Dear LA County Planning Commission,

As California continues to be the leader in climate policies, we trust that any homes and jobs created in Los Angeles will also be sustainable and climate friendly. At the same time, if not done carefully, policies can also undermine our housing goals, increase our energy costs, and further curtail needed economic growth in Los Angeles. I am deeply concerned with Final Draft 2045 County Climate Action Plan (Draft CAP) and its impact on housing, jobs, mobility, and infrastructure. The proposal includes a density mandate of 300 jobs per acre for new projects. Of the county's 810 planning zones, only nine have more than 20 jobs per acre. This restriction will have a significant impact on small retailers, manufacturing facilities, entertainment venues and other sectors that drive our region's economic engine. The proposal also demands 90% of all water consumed – and 80% of agricultural irrigation water – be supplied exclusively by local water sources consisting of reclaimed water, graywater and potable recycled water by 2045. A vast majority of our water is imported - and this could have a significant impact on our housing and development. Although these are only considered aspirational, with the inclusion in the general plan, we have concerns that this will be far more binding than just "aspirational." It is clear that we must conduct a comprehensive Economic Impact Analysis to gain a better understanding of how this proposal may affect business and its potential implications to meeting the County Approved General Plan/Housing Element Regional Housing Needs Assessment goals. And we ask that Regional Planning and the LA County Board of Supervisors provide such a analysis.

Sincerely,  
Chris Duff

[chris@beachregroup.com](mailto:chris@beachregroup.com)

1601 , Sepulveda Blvd Ste 123 Manhattan Beach, CA 90266

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**From:** [Matt Carpenter](#)  
**To:** [DRP EPS Climate](#)  
**Subject:** FW: Newhall Comments on Final LA County 2045 CAP  
**Date:** Friday, November 10, 2023 4:34:57 PM  
**Attachments:** [image001.png](#)  
[111023 Newhall Comment Letter-Final LA County CAP.pdf](#)

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**CAUTION:** External Email. Proceed Responsibly.

Resending from moments ago. Please confirm receipt of my email with Newhall's comments attached. Thank you.



Matt Carpenter  
Vice President  
Environmental Resources

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25124 Springfield Court | Suite 300 | Valencia, CA 91355

---

**From:** Matt Carpenter  
**Sent:** Friday, November 10, 2023 4:29 PM  
**To:** [DRP EPS Climate <climate@planning.lacounty.gov>](#)  
**Subject:** Newhall Comments on Final LA County 2045 CAP

Ms. Hua/LA County Department of Regional Planning:  
Thank you for receiving my email. The attached includes comments on the Final County 2045 Climate Action Plan submitted on behalf of the Newhall Land and Farming Company. Please contact me with any questions or to discuss further. Thank you.



Matt Carpenter  
Vice President  
Environmental Resources

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November 10, 2023

Thuy Hua, Supervising Regional Planner  
Los Angeles County Department of Regional Planning  
320 West Temple Street, 13<sup>th</sup> Floor  
Los Angeles, CA 90012  
Email: [climate@planning.lacounty.gov](mailto:climate@planning.lacounty.gov)

**Re: Comments on Project No. 2019-002015-(1-5) Final 2045 Climate Action Plan**

Dear Ms. Hua:

The Newhall Land and Farming Company thanks you for the opportunity to provide comments on the Final Draft of the Los Angeles County 2045 Climate Action Plan (“CAP”) in advance of the Regional Planning Commission’s meeting on November 15, 2023, to consider an amendment to the Los Angeles County General Plan with the final CAP. These comments build on our prior comment letter, dated May 15, 2023, regarding a revised draft of the CAP. As the proponent of California’s first large-scale net-zero greenhouse gas (“GHG”) mixed-use community, Newhall appreciates the County’s efforts to reduce GHG emissions while encouraging the development of critical housing.

**Innovative Net-Zero GHG Housing Project** – As explained in our May 2023 comment letter on the draft CAP, Newhall has implemented a California Air Resources Board-approved, net-zero GHG program that implements a broad suite of innovative GHG reduction strategies to maximize onsite and local GHG reductions, such as installing thousands of EV charging stations throughout the County and implementing a Building Retrofit Program in disadvantaged communities within the County, as well as to achieve other GHG reductions like Newhall’s conservation of California forest lands and funding of dairy digester projects in California. To date, Newhall has spent tens of millions of dollars on the net-zero GHG program. Newhall has also expended considerable energy and effort on sourcing acceptable projects in the appropriate geographic locations and meeting the strict requirements of the program, generating the necessary technical data and methodologies, obtaining certification from the climate registry, and implementing the GHG reduction activities.

When the County Board of Supervisors reapproved Mission Village and Landmark Village in 2017, the Board found that Newhall’s net-zero GHG program would feasibly achieve net-zero GHG emissions based on substantial evidence in the record:

- “The Board further finds that, based on substantial evidence in the record, potentially significant GHG impacts of the Mission Village Project are reduced to less-than-significant levels with implementation of the following measures and that the Project will *feasibly and reliably achieve net zero GHG emissions*.”<sup>1</sup>

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<sup>1</sup> Los Angeles County, Mission Village, Supplemental CEQA Findings and Statement of Overriding Considerations, July 2017, p. 15 (emphasis added).

- “In addition, because the Project would result in ***no net increase of GHG emissions***, it would not conflict with any plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.”<sup>2</sup>

The Board concluded: “The Project represents ***an innovative*** demonstration of a mixed-use development ***Project providing needed housing*** and commercial development in a ***manner consistent with California’s GHG reduction goals***.”<sup>3</sup> Now, families have moved into Mission Village and continue to do so each month, adding to the County’s diversity of housing stock and providing a place for families to create a new community for generations to come.

**Newhall Satisfies CEQA GHG Compliance Pathway and CAP Goals** – The 2022 Scoping Plan expressly identifies multiple compliance pathways for evaluating a project’s GHG impacts under the California Environmental Quality Act (“CEQA”), including for projects demonstrated to achieve “net-zero GHG emissions.”<sup>4</sup> Indeed, the 2022 Scoping Plan specifically recognizes Newhall as an example net-zero GHG project that satisfies this CEQA compliance pathway.<sup>5</sup>

Further, the CAP incorporates California GHG reduction goals as its own: “Consistency with the 2022 Scoping Plan, SB 32, and AB 1279 is an appropriate metric by which to determine the significance of the 2045 CAP’s GHG emissions through 2045.”<sup>6</sup> Newhall already exceeds the CAP’s 2030 and 2035 reduction targets and satisfies the CAP’s aspirational target of carbon neutrality by 2045, twenty years early.

**Newhall Is Consistent with the CAP and Air Quality Element** – We appreciate the County’s responses that recognize implementation of a CARB-approved, net-zero GHG program, such as Net Zero Newhall, can continue to satisfy CEQA for future phases.

The current draft of the CAP provides that projects qualifying for a CEQA exemption are deemed consistent with the CAP. Newhall’s net-zero GHG program is unique because it was previously approved by CARB, is expressly recognized in the 2022 Scoping Plan as consistent with California’s climate goals, and has withstood extensive litigation challenges up to the California Supreme Court. Given the unique characteristics of Newhall’s net-zero GHG program, we respectfully request that the CAP also expressly provide that implementing Newhall’s existing CARB-approved, net-zero GHG program<sup>7</sup> for all future Newhall villages<sup>8</sup> is deemed consistent with the CAP, as well as consistent with accompanying Air Quality Element

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<sup>2</sup> *Id.*, p. 26 (emphasis added).

<sup>3</sup> *Id.*, p. 39 (emphasis added).

<sup>4</sup> 2022 Scoping Plan Update, Appendix D (Local Actions).

<sup>5</sup> 2022 Scoping Plan Update, Appendix D (Local Actions), Section 3.2.2.

<sup>6</sup> Final CAP, p. 1-5, fn. 2.

<sup>7</sup> The existing, CARB-approved, net-zero GHG program is described in full in the Final Additional Environmental Analysis, RMDP/SCP, California Department of Fish and Wildlife, SCH No. 2000011025, June 2017. For avoidance of doubt, no additional GHG requirements should be imposed on Newhall’s CARB-approved program because CARB and the County have already determined it reduces the project’s emissions to net-zero GHG.

<sup>8</sup> The Final Additional Analysis covered Entrada South, Valencia Commerce Center, and the Newhall Ranch Specific Plan villages (Mission Village, Landmark Village, Homestead South, Homestead North, and Potrero Valley). Newhall has committed to implement the full CARB-approved net-zero GHG program at Legacy Village and Entrada North. Mission Village and Landmark Village have already been entitled.



amendments implementing the CAP and achieving the County’s climate action policy goals and objectives.

Newhall appreciates the County’s leadership on climate and housing. We look forward to continuing to work with the County on these important sustainability initiatives.

Sincerely,

A handwritten signature in blue ink, appearing to read 'MC', is positioned above the printed name.

Matt Carpenter  
Vice President, Environmental Resources  
On behalf of The Newhall Land and Farming Company

**From:** [Rafael Andrade](#)  
**To:** [Thuy Hua](#); [Iris Chi](#)  
**Cc:** [Connie Chung](#); [Edward Rojas](#); [Elida Luna](#)  
**Subject:** FW: LA County Climate Action Plan - need for an economic impact analysis  
**Date:** Monday, November 13, 2023 7:05:38 AM

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FYI

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**From:** myvoice@oneclickpolitics.com <myvoice@oneclickpolitics.com>  
**Sent:** Friday, November 10, 2023 9:45 AM  
**To:** EDL-DRP BU-S Commission Services <commission@planning.lacounty.gov>  
**Subject:** LA County Climate Action Plan - need for an economic impact analysis

**CAUTION:** External Email. Proceed Responsibly.

Re: LA County Climate Action Plan - need for an economic impact analysis

Dear LA County Planning Commission,

As California continues to be the leader in climate policies, we trust that any homes and jobs created in Los Angeles will also be sustainable and climate friendly. At the same time, if not done carefully, policies can also undermine our housing goals, increase our energy costs, and further curtail needed economic growth in Los Angeles. I am deeply concerned with Final Draft 2045 County Climate Action Plan (Draft CAP) and its impact on housing, jobs, mobility, and infrastructure. The proposal includes a density mandate of 300 jobs per acre for new projects. Of the county's 810 planning zones, only nine have more than 20 jobs per acre. This restriction will have a significant impact on small retailers, manufacturing facilities, entertainment venues and other sectors that drive our region's economic engine. The proposal also demands 90% of all water consumed – and 80% of agricultural irrigation water – be supplied exclusively by local water sources consisting of reclaimed water, graywater and potable recycled water by 2045. A vast majority of our water is imported - and this could have a significant impact on our housing and development. Although these are only considered aspirational, with the inclusion in the general plan, we have concerns that this will be far more binding than just "aspirational." It is clear that we must conduct a comprehensive Economic Impact Analysis to gain a better understanding of how this proposal may affect business and its potential implications to meeting the County Approved General Plan/Housing Element Regional Housing Needs Assessment goals. And we ask that Regional Planning and the LA County Board of Supervisors provide such a analysis.

Sincerely,  
Mr. George Francisco  
[policy@venicechamber.net](mailto:policy@venicechamber.net)  
337 1/2 Rose Ave Venice, CA 90291

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**From:** [John Lloyd](#)  
**To:** [DRP EPS Climate](#)  
**Subject:** Support CAP  
**Date:** Monday, November 13, 2023 7:27:41 AM

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**CAUTION: External Email. Proceed Responsibly.**

Dear Planning Commission members,

I am a resident of Los Angeles County and I urge you to support the final draft of the LA County Climate Action Plan.

Transportation is 52% of county GHGs, and, as the California Air Resources Board's 2022 Scoping Report concludes, meeting GHG reduction targets will take more than vehicle electrification alone. Metropolitan areas must also reduce VMT by investing in transit and active transportation. It is also important that the county's housing goals align with the reduction of VMT, with more housing near transit and jobs. All of these goals are necessary to reduce transportation GHGs. We cannot cherry pick. The plan's transportation element sets achievable goals in all these areas in ways that align with the state's GHG reduction targets.

This Climate Action Plan sets LA County on the road to lower transportation emissions, and a safer, more equitable transportation system through infrastructure improvements and smart investments in transit and housing. I urge you to approve this plan.

Sincerely,  
John Lloyd  
Sierra Madre, CA 91024

**From:** [Rafael Andrade](#)  
**To:** [Thuy Hua](#); [Iris Chi](#)  
**Cc:** [Connie Chung](#); [Edward Rojas](#); [Elida Luna](#)  
**Subject:** FW: LA County Climate Action Plan - need for an economic impact analysis  
**Date:** Monday, November 13, 2023 7:06:06 AM

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FYI

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**From:** myvoice@oneclickpolitics.com <myvoice@oneclickpolitics.com>  
**Sent:** Friday, November 10, 2023 12:24 PM  
**To:** EDL-DRP BU-S Commission Services <commission@planning.lacounty.gov>  
**Subject:** LA County Climate Action Plan - need for an economic impact analysis

**CAUTION:** External Email. Proceed Responsibly.

Re: LA County Climate Action Plan - need for an economic impact analysis

Dear LA County Planning Commission,

As California continues to be the leader in climate policies, we trust that any homes and jobs created in Los Angeles will also be sustainable and climate friendly. At the same time, if not done carefully, policies can also undermine our housing goals, increase our energy costs, and further curtail needed economic growth in Los Angeles. I am deeply concerned with Final Draft 2045 County Climate Action Plan (Draft CAP) and its impact on housing, jobs, mobility, and infrastructure. The proposal includes a density mandate of 300 jobs per acre for new projects. Of the county's 810 planning zones, only nine have more than 20 jobs per acre. This restriction will have a significant impact on small retailers, manufacturing facilities, entertainment venues and other sectors that drive our region's economic engine. The proposal also demands 90% of all water consumed – and 80% of agricultural irrigation water – be supplied exclusively by local water sources consisting of reclaimed water, graywater and potable recycled water by 2045. A vast majority of our water is imported - and this could have a significant impact on our housing and development. Although these are only considered aspirational, with the inclusion in the general plan, we have concerns that this will be far more binding than just "aspirational." It is clear that we must conduct a comprehensive Economic Impact Analysis to gain a better understanding of how this proposal may affect business and its potential implications to meeting the County Approved General Plan/Housing Element Regional Housing Needs Assessment goals. And we ask that Regional Planning and the LA County Board of Supervisors provide such a analysis.

Sincerely,  
Mr. Tom Grable  
[tom.grable@tripointehomes.com](mailto:tom.grable@tripointehomes.com)  
5 Peters Canyon, Suite 100 Irvine, CA 92606

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**From:** [Rafael Andrade](#)  
**To:** [Thuy Hua](#); [Iris Chi](#)  
**Cc:** [Connie Chung](#); [Edward Rojas](#); [Elida Luna](#)  
**Subject:** FW: Letter Regarding 2024 LA County Climate Action Plans  
**Date:** Monday, November 13, 2023 7:07:09 AM  
**Attachments:** [image001.png](#)  
[LA County Climate Action Plan 11.10.23.pdf](#)

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Please see attached letter.

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**From:** Victor Reyes <[Victor@vica.com](mailto:Victor@vica.com)>  
**Sent:** Friday, November 10, 2023 2:54 PM  
**To:** DRP EPS Climate <[climate@planning.lacounty.gov](mailto:climate@planning.lacounty.gov)>; EDL-DRP BU-S Commission Services <[commission@planning.lacounty.gov](mailto:commission@planning.lacounty.gov)>  
**Subject:** Letter Regarding 2024 LA County Climate Action Plans

**CAUTION:** External Email. Proceed Responsibly.

Good afternoon,

Please see VICA's attached letter requesting an economic analysis regarding LA County's proposed inclusion of 2024 CAP in the County's General Plan.

If you have any questions, feel free to reach out.

Best Regards,



**Victor Reyes-Morelos**  
Legislative Affairs Manager  
Valley Industry & Commerce Association  
[www.vica.com](http://www.vica.com)  
Office: 818-817-0545  
Cell: 747-246-1510



November 10, 2023

Los Angeles County Board of Supervisors  
500 West Temple Street  
Los Angeles, CA, 90012

**RE: Concerns Regarding the 2024 Climate Action Plan's Impact on Housing, Jobs, and Economic Development in Los Angeles County**

Dear Board of Supervisors and County Planning Staff,

The Valley Industry & Commerce Association (VICA) is writing to express our concerns regarding the 2024 Climate Action Plan (CAP) and its proposed inclusion in the Los Angeles County General Plan. We share the commitment to addressing climate change and support efforts to reduce greenhouse gas emissions. However, the current draft of the 2024 CAP presents various issues that may have adverse effects on housing, jobs, and economic development in the region and Southern California.

County staff has described the 2024 CAP as an aspirational document. However, should it be integrated into the General Plan, it will assume a mandatory status, potentially enabling third parties to obstruct infrastructure, job-creation, and housing projects by alleging non-compliance with the 2045 CAP. Furthermore, once adopted as part of the General Plan, this integration will constrain the County's ability to amend the CAP without additional CEQA review, thereby hampering our capacity to adapt to evolving circumstances.

The 2024 CAP's water demand requirements place significant burdens on the utilization of recycled water, graywater, or potable reuse, with strict deadlines that may prove unattainable. The exclusion of imported water sources and constraints on water technology alternatives may adversely impact housing and vital development projects, particularly in instances where these technologies are neither available nor financially feasible.

Moreover, the CAP introduces limitations on "net-zero water" policies without a formally adopted program, potentially impeding new housing and essential development projects, especially when alternative water sources are infeasible or economically unsound. The exclusion of carbon offset credits and locational constraints is at odds with the state's approach and unnecessarily obstructs project development. This stance contradicts the state's flexibility to employ carbon offset credits and reductions outside of California and may hinder project advancement.

The mandate for a high jobs/housing balance with a job density of 300 jobs per acre lacks regional examples or feasibility assessments, introducing inconsistencies with County General Plans and potential legal challenges. The insistence on heightened density near high-quality transit areas constrains project locations and disregards the multifaceted factors that influence site selection. Furthermore, the call to decarbonize trucks, while a commendable objective, may prove universally unattainable, potentially causing complications for projects. Lastly, the





incorporation of zero-emission technologies for off-road vehicles and equipment presents challenges, as such technologies are yet unavailable for many types of equipment.

Given these concerns, we request the County conduct an economic analysis to thoroughly evaluate the potential economic impacts of the 2024 CAP on housing, jobs, and development within the County. It is vital to strike a balance between environmental goals and the sustainable growth of our community. We encourage further dialogues to address these issues and seek solutions that simultaneously promote a healthy environment and a thriving economy.

Sincerely,

Victor Berrellez  
VICA Chair

Stuart Waldman  
VICA President