



MOUNTAINS RECREATION & CONSERVATION AUTHORITY

Los Angeles River Center & Gardens
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January 6, 2016

Samuel Dea
Department of Regional Planning
Los Angeles County
320 West Temple Street
Los Angeles, California 90012

Comments on Revised Notice of Preparation Centennial Project – SCH No. 2004031072

Dear Mr. Dea:

The Mountains Recreation and Conservation Authority (MRCA) provides the following comments on the subject revised Notice of Preparation (NOP). By reference this letter incorporates the Santa Monica Mountains Conservancy's April, 26, 2004 NOP letter and the South Coast Wildlands April 20, 2004 NOP letter.

The MRCA's letter focuses on the inclusion of key Draft Environmental Impact Report (DEIR) alternative elements that must be included to provide an adequate range of alternatives. Even a 200-acre development footprint through the bulk loss of non-native grassland, Condor foraging area, and visual impacts from highways would result in unavoidable significant adverse biological and visual impacts. Thus any project that has a concentrated 200-acre disturbance footprint would require a statement of overriding considerations from the Board of Supervisors.

CEQA requires the avoidance of significant impacts where possible. The 12,323-acre project site has ample space to design project alternatives that maximize habitat and habitat connectivity protection and viewshed protection. Because of the scale and ecological magnitude of the project, we urge the County to require an unprecedented number of DEIR alternatives to show the broad range of potential project footprints.

A project that inevitably would result in multiple unavoidable significant adverse environmental impacts and require a zone change to a just-adopted Antelope Valley Area Plan must maximize habitat and view protection. The baseline for the economic viability of DEIR alternatives must be a development project consistent with the Antelope Valley Area Plan. Proclaimed project economic infeasibility for any alternative project exceeding the zoning allowances of the Area Plan is baseless because a project cannot earn an increased density zone change based its economic infeasibility with current zoning.

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We urge the County to require several DEIR alternatives that, at a minimum, have zero development or indirect impacts in: 1) any Significant Ecological Area or habitat linkage addressed in the South Coast Wildlands Missing Linkages Study and 2) south of

Highway 138. Development south of Highway 138 would open up a large window of viewshed impact and wildlife movement potential that can be easily avoided.

Another DEIR alternative should follow those parameters in the above paragraph and further eliminate all development or indirect impacts west of the Aqueduct. Even this alternative project footprint would leave a minimum of 23 intact planning areas. The proposed project plans show four access road intersections with Highway 138 east of the Aqueduct so adequate access is not a limitation to DEIR alternatives that include no development west of the Aqueduct and south of Highway 138.

Another DEIR alternative should then take the maximum development boundary described in the above paragraph and eliminate all direct impacts to California Department of Fish and Wildlife jurisdictional streambeds with the use of clear span bridges and development setbacks.

Another DEIR alternative should then take the defined restrictions of the alternative described in the immediately above paragraph and further shape a development footprint that provides a minimum 350-foot-wide, contiguous habitat linkage from the northern project boundary to at least two drainage undercrossings under Highway 138. Wherever this north-south oriented habitat linkage crosses proposed streets, there must be no street lighting within 100 feet of the linkage edge, no fencing, and no non-native landscaping.

To be adequate the DEIR must show and analyze where Caltrans proposes to put drainage under-crossings along Highway 138 with its proposed High Desert Corridor and connector project.

The analysis of every DEIR alternative must show how that alternative would mesh in regards to habitat connectivity with the protected and unprotected remainder portions of the Tejon Ranch property and all adjoining properties.

Please direct all future correspondence to Judi Tamasi of our staff at the above letterhead address and a judi.tamasi@mrca.ca.gov.

Sincerely,

George Lange
Chairperson