



CALIFORNIA AND PACIFIC OFFICE
*protecting endangered species and wild places through
science, education, policy, and environmental law*

VIA FACSIMILE AND FEDERAL EXPRESS OVERNIGHT DELIVERY

April 21, 2004

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County of Los Angeles
Department of Regional Planning
Impact Analysis Section
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Re: Comments on the Notice of Preparation for Centennial Specific Plan Project Description; Project Number 02-232; Specific Plan; Conditional Use Permits; Oak Tree Permit; Zone Change; Development Agreement; Vesting Tentative Tract Map Numbers 60020, 60021, 60023; Vesting Tentative Parcel Map Number 60022

Dear Dr. Koutnik:

The Center for Biological Diversity (“the Center”) and the Center on Race, Poverty, and the Environment (“CRPE”) submit the following comments on the Notice of Preparation for Centennial Specific Plan Project Description; Project Number 02-232; Specific Plan; Conditional Use Permits; Oak Tree Permit; Zone Change; Development Agreement; Vesting Tentative Tract Map Numbers 60020, 60021, 60023; Vesting Tentative Parcel Map Number 60022 (hereinafter “the Project” or “Centennial Development”). The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 9,000 members throughout California and the western United States, including in Los Angeles, Kern, and Ventura counties and other areas that the Project would impact. CRPE is a non-profit environmental justice advocacy group with offices in Delano, Fresno and San Francisco, California. CRPE represents low-income communities and workers throughout the United States who are fighting environmental hazards. CRPE stresses the need for community-based, community-led organizing and litigation.

The proposed Centennial Development consists of 23,000 residential units and over 14 million square feet of commercial and retail space on over 11,600 acres, rendering it the largest single development project ever proposed in California. The project applicant, listed in the NOP as

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“Centennial Founders, LLC” (NOP at 2) proposes to place a development the size of several mid-size cities in the heart of one of California’s most pristine remaining natural areas. The Center and CRPE urge the County of Los Angeles (“County”) to give this unprecedented proposal the close scrutiny that it deserves and that is required by law.

The Tejon Ranch, which spreads from the southern end of the San Joaquin Valley from the foothills of the Sierra Nevada, over the Tehachapi Mountains, and into the Antelope Valley, is a unique and irreplaceable piece of California’s natural heritage. The 270,000 acres of habitat is a hotspot of biological diversity that lies at the confluence of four major biogeographic regions. It is a haven for rare and endemic species, ancient oak trees, endangered California condors, rare native vegetation communities, and intact watersheds and streams. At least nine plant communities have been identified in this region, as well as hundreds of plant series (some unidentified), including Pleistocene relicts such as Great Basin Sagebrush and Blackbrush scrub.

The Tejon Ranch is surrounded by other public and private protected land, including the Los Padres National Forest and Windwolves Preserve to the southwest, Bitterroot National Wildlife Refuge and Carrizo Plain to the west, and the Sequoia National Forest and Bureau of Land Management Lands to the northeast. The Tejon Ranch is a vital corridor connecting the southern Sierra to the Transverse Ranges and beyond. See K. Penrod, C. Cabanero, C. Luke, P. Beier, W. Spencer, and E. Rubin, *South Coast Missing Linkages Project: A Linkage Design for the Tehachapi Connection* (September 2003), Unpublished, South Coast Wildlands Project, Monrovia, CA. The development of the Centennial site would irrevocably and fundamentally alter the California landscape.

While the NOP has provided very little information, the Center and CRPE would like to take this opportunity to emphasize that the County must fully analyze each environmental impact of all phases of the Centennial Development in the EIR. Importantly, the County must address the whole of the action described in the Notice of Preparation (“NOP”). CEQA Guidelines, 14 Cal. Code Regs. (“Guidelines”) § 15063. For example, the EIR must describe and analyze all phases of the Project, all road and infrastructure construction and expansion contemplated by the Project, as well as all growth inducement of the Project. The EIR must also carefully evaluate the project’s impacts not only in Los Angeles County, where the Project will physically be constructed, but also in Kern County and the San Joaquin Valley, Ventura County, and all other areas affected by the Project’s impacts. While the Project is located in the extreme northwestern portion of Los Angeles County, many of the environmental impacts will occur in neighboring counties. If the EIR improperly limits the scope of its analysis, this will invalidate the entire EIR.

Alternatives Analysis. A crucial component of the EIR for this Project will be a full and thorough discussion of alternatives, particularly of alternative locations for the Project with fewer environmental impacts. For example, a close and detailed look at alternative locations for the Project in urban locations with a higher proposed residential density and smaller footprint is required. The alternatives section also should include a comparison of the costs of each alternative to wildlife, air quality, vegetative communities, water quality, aesthetics, and taxpayers.

Air Quality. The EIR must thoroughly analyze and mitigate the Project’s direct, indirect, and cumulative impacts on air quality in each air basin that will be impacted by the Project’s emissions as well as the impact these emissions will have on human health, wildlife, and native flora. The Project is proposed in an area with the nation’s worst air quality. While the Project is physically located in the

the Mojave Desert Air Basin and the Antelope Valley Air Quality Management District, the air pollution emissions from Centennial will impact other air basins and districts, including the San Joaquin Valley Air Quality Control District and the South Coast Air Quality Control District. Impacts to all affected basins and districts must be fully evaluated.

Impacts on vegetation. Native grasslands, wildflower fields, oak and mixed woodlands, and chaparral all exist on site. NOP at 5. The direct, indirect, and cumulative impacts of the Project on vegetation in relation to the environmental baseline must be fully analyzed. In addition, even the relatively more disturbed portions of the Project site (annual grasslands) provide habitat for numerous species in the area, and must not be undervalued. Also, all vegetative resource surveys ever conducted on the Project site must be disclosed to the public.

The Project Applicant is requesting a Conditional Use Permit (“CUP”) to develop portions of two areas currently designated Significant Ecological Areas (SEAs). NOP at 7. It is also requesting a CUP to remove oak trees. *Id.* The Center and CRPE urge the County to reconsider the appropriateness of these actions in light of governing law.

Impacts on biological resources. It is critical that the EIR fully discuss and analyze the direct, indirect, and cumulative impacts of the Project on animal populations and movement. In addition, measures to remove or reduce barriers to movement on the Centennial site must be analyzed and incorporated into the Project as either part of the Project design or required mitigation. NOP at 6 (discussing limitations of existing culverts and roads currently crossing aqueduct). Further, all biological resource surveys previously conducted on the Project site must be disclosed to the public as part of the description of the environmental baseline.

Water quantity and quality. The EIR must fully assess and ensure the availability of an adequate water supply to support the Project. In addition, the EIR must assess the impacts of the Project on surface and groundwater quantity and quality. Riparian and wetland habitats occur in association with drainages, springs, and seeps located on site. NOP at 5.

Traffic impacts. The Project contemplates that the primary access route to the Centennial project site will be SR-138 via I-5. Also planned are 227.4 acres of “internal roads” as well as 470.8 acres of “major roads.” NOP at 13. The traffic, air quality, noise, and aesthetic impacts the proposed parkways, major highways, secondary highways, collector streets, local roadways, and improvements to existing routes must be fully analyzed.

Impacts of Sprawl. The EIR must fully disclose the direct, indirect and cumulative impacts of the proposed development and the growth it will induce. Research has identified qualitative and quantitative impacts from sprawl style development, including:

- *Higher rates of driving and vehicle ownership.* The research indicates that in relatively sprawling regions, cars are driven longer distances per person than in places with lower-than-average sprawl. Over an entire region, that adds up to millions of extra miles and tons of additional vehicle emissions.
- *Increased levels of ozone pollution.* The study found that the degree of sprawl is more strongly related to the severity of peak ozone days than per capita income or

employment levels. The difference in ozone peaks appears significant enough to potentially mean the difference between reaching or failing to meet federal health-based standards. Failing to reach the standard not only imperils the health of children and other vulnerable populations, but also subjects regions to a raft of rigorous compliance measures.

- *Greater risk of fatal accidents.* Residents of more sprawling areas are at greater risk of dying in a car crash, the research indicates. In the nation's most sprawling region, Riverside CA, 18 of every 100,000 residents die each year in traffic crashes. The eight least sprawling metro areas all have traffic fatality rates of fewer than 8 deaths per 100,000. The higher death rates in more sprawling areas may be related to higher amounts of driving, or to more driving on high-speed arterials and highways, as opposed to driving on smaller city streets where speeds are lower. Speed is a major factor in the deadliness of automobile crashes.
- *Depressed rates of walking and alternative transport use.* In more sprawling places, people on their way to work are far less likely to take the bus or train or to walk. Twice the proportion of residents take public transit to work in relatively non-sprawling metro areas versus those with below-average scores. Likewise, thousands more residents walk to work in regions that sprawl less.
- *No significant differences in congestion delays.* The research found that sprawling metros exhibited the same levels of congestion delay as other regions. This finding challenges claims that regions can sprawl their way out of congestion.

See R. Ewing, R. Pendall, and D. Chen, Measuring Sprawl and Its Impact, *Smart Growth America Growth* (2002), <http://www.smartgrowthamerica.com/>.

Other Permits, Authorizations, and Consistency Determinations. The DEIR should provide the public with a list and description of all other permits, authorizations and/or analyses required for the Project, including the statutory basis for the required permit, the date of application (or estimated date) for the permit, the permitting agency, and any opportunity for public comment on each permit. Such permits, authorizations and/or analyses may include Clean Water Act Section 402 National Pollutant Discharge Elimination System permits, federal Endangered Species Act Section 7 consultation documents (including Biological Opinion(s) and any Incidental Take Permits or Statements issued), California Fish and Game Code Sections 1601 and 1603 permits, federal Clean Water Act Section 404 permits, National Environmental Policy Act environmental impacts analysis documents, and air quality permits.

The Proposed Project site, 12,000 acres of the Tejon Ranch, is part of a unique and irreplaceable piece of California's natural heritage, with natural and biological resources of incomparable value. In addition, the region is already suffering from some of the worst impacts of sprawl style growth, including horrendous air quality and traffic congestion. The Center believes that if the true environmental impacts of the Centennial Development are disclosed to the public and decision makers, it will become abundantly clear that the proposed Project should be denied. The Center supports preservation of the entire Tejon Ranch as natural habitat and open space. As Los Angeles County continues processing the application and the CEQA process, we look forward to

reviewing an EIR that addresses each of the issues raised during the scoping process and that complies with CEQA and its implementing regulations as well as all other applicable federal, state, and local laws.

Sincerely,

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