



CALIFORNIA
NATIVE PLANT SOCIETY

August 17, 2018

Los Angeles County Regional Planning Commission
Department of Regional Planning
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Submitted via email to: rruiz@planning.lacounty.gov and
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Dear Los Angeles County Regional Planning Commission,

Thank you for the continued opportunity to engage in the very important dialogue related to the proposed Centennial Specific Plan. The scale of this project and the habitats that are threatened make this a project of utmost importance to the California Native Plant Society.

The California Native Plant Society (“CNPS”) is a non-profit environmental organization with nearly 10,000 members in 35 local chapters. CNPS’ mission is to protect California’s native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed and environmentally friendly policies, regulations, and land management practices.

During our review of testimony presented at past Regional Planning Commission hearings on Centennial and continued analysis of the Centennial Specific Plan FEIR we have uncovered some issues that need to be addressed ahead of the August 29 hearing.

Issue 1: Misrepresentation of the Tejon Ranchwide Agreement

In 2008, Tejon Ranch Company (TRC) entered into an agreement with five environmental organizations, the Sierra Club, Endangered Habitats League, Audubon of California, Natural Resources Defense Council, and Planning and Conservation League.

The complete text of the Ranchwide Agreement is available at:
<https://www.sec.gov/Archives/edgar/data/96869/000119312508138009/dex1028.htm>

In testimony at public hearings of the Regional Planning Commission, TRC has repeatedly misrepresented the nature of this agreement by implying that the five environmental organizations party to the 2008 Ranchwide Agreement support TRC’s

proposed development actions. For example, on June 6, at the Regional Planning Commission hearing, Greg Medeiros, TRC Vice President Community Development, stated that Centennial “complies and conforms and is consistent with all of the scientific work done by the Sierra Club, NRDC, and other signatories of the Ranchwide Agreement. Boundaries were drawn. This site fits inside of the place where people think, okay. This is where development should go. To meet our needs, this is where development should go. What is around it should be preserved.”

This statement is simply not accurate. The primary product of TRC’s Ranchwide Agreement with the five environmental organizations was for these groups to “not oppose the development of the Projects, or any of the Project Approvals, consistent with the terms of the Agreement.” See Ranchwide Agreement Exhibit S pages 1-4.

It is important for the Regional Planning Commission and Board of Supervisors to recognize that an agreement to “not oppose” is not equivalent to support. The Centennial Specific Plan does not have broad support of the environmental community or any other community for that matter.

Issue 2: The Mitigation Preserve Design in the FEIR is Inadequate

For the latest version of the mitigation preserve design proposed by TRC for the Centennial Specific Plan please see PDF pages 1455-1457 in FEIR Volume 2: http://planning.lacounty.gov/assets/upl/case/sp_02-232_pm060022-feir-2.pdf. Please see the map labeled Exhibit 5.7-10 on pdf page 1455.

This version of the mitigation preserve supersedes the previous version presented in DEIR Appendix 5.7 pages 136-138 and Exhibit 5.7-10. A notable difference between the DEIR and FEIR is the addition of a large area of proposed mitigation land to the east of the project site in Area 7 (FEIR pdf page 1455).

In order to evaluate the adequacy of the mitigation preserve design CNPS conducted a GIS exercise that involved manually digitizing FEIR Exhibit 5.7-10 and analyzing proposed mitigation areas in relation to existing conservation easements. A GIS map of conservation easements on Tejon Ranch was obtained from the National Conservation Easement Database: <https://www.conservationeasement.us/>.

The following maps and table show quite clearly that TRC is relying heavily on lands already preserved with conservation easements for its mitigation preserve design. A brief description of each map follows:

Map 1: Shows areas proposed as mitigation by TRC in green with area numbers corresponding to those in FEIR Exhibit 5.7-10. Areas covered by existing conservation easements appear as black-hashed lines.

Map 2: Shows the current land use designation for each of the areas in the mitigation preserve. Areas in yellow are “Onsite mitigation”, those in red are offsite mitigation

areas that occur within conservation easements, and those that are in green are offsite mitigation areas that are outside of the areas covered by conservation easements.

Map 3: Maps the grassland habitat in the proposed mitigation preserve. These areas were digitized to the best of our ability, but the complex nature of the polygons in FEIR Exhibit 5.7-10 mean that there may be some small differences between Map 3 and the grassland map in the FEIR.

The table below and Map 1 summarize the acreage and land use designation in the Centennial Mitigation Preserve:

| Mitigation Areas | Grassland Acreage | Total Acreage | Acreage in Easements | Grassland Acreage in Easements |
|---|--------------------------|----------------------|-----------------------------|---------------------------------------|
| On-site | | | | |
| North | 1899 | 2898 | 0 | 0 |
| South | 90 | 968 | 0 | 0 |
| Sub-total | 1989 | 3866 | 0 | 0 |
| | | | | |
| Off-site | | | | |
| Area 1 | 1734 | 6497 | 1340 | 90 |
| Area 2 | 1597 | 2556 | 0 | 0 |
| Area 3 | 3059 | 4183 | 4183 | 3059 |
| Area 4 | 4494 | 7319 | 6480 | 3865 |
| Area 5 | 643 | 643 | 643 | 643 |
| Area 6 | 1005 | 2429 | 0 | 0 |
| Area 7 | 7877 | 15668 | 3126 | 1440 |
| Sub-total | 20409 | 39295 | 15772 | 9097 |
| | | | | |
| Total | 22398 | 43161 | 15772 | 9097 |
| | | | | |
| Percentage of Total in Easements | 36.5 | | | |
| Percentage of Grassland in Easements | 40.6 | | | |

A total of 36.5 percent of all land in the mitigation preserve is already covered by conservation easements. The Ranchwide Agreement provided “an option to purchase conservation easements over an additional 62,000 acres of Tejon Ranch” (see Ranchwide Agreement, page 1). These 62,000 acres, in addition to the 178,000 acres conserved as part of the Ranchwide Agreement sum to 240,000 acres, or 88.9% of the land owned by TRC. In 2010, the state’s Wildlife Conservation Board (WCB) agreed to purchase 62,000 acres of TRC land using 15.8 million taxpayer dollars (see WCB

minutes from November 2010, see Attachment 1_WCBminutes.pdf). Areas in the Centennial mitigation preserve include portions of the Bi-Centennial and Tri-Centennial Easements and correspond to mitigation Areas 3, 4, and 5 in the mitigation preserve (see 5.7-10 and Map 1). The land within the mitigation preserve that was purchased by WCB amounts to 11,306 acres or 29% of the total offsite mitigation acreage. An additional, 10,000 acres of easements were acquired in 2014 to accommodate the re-routing of the Pacific Crest Trail (PCT) on Tejon Ranch (see <http://www.latimes.com/travel/deals/la-trb-tejon-ranch-pacific-crest-trail-20140506-story.html>). Areas proposed for offsite mitigation within the PCT easement total 4,466 acres. Combined, areas covered by existing easements total 15,772 acres, or 36.5% of the mitigation preserve.

FEIR Volume 2 (pdf page 1456), states that areas covered by existing easements are “available for mitigation activities that include enhancement, restoration, or creation, are not available for preserved mitigation acreage since the existing Conservation Easement already requires preservation.” To our knowledge, TRC has yet to detail the enhancement, restoration, or creation that it intends to complete on these lands. Furthermore, has TRC detailed which, if any, of the areas within the WCB easements needs these actions? This leads us to question why these areas are even being considered as part of the mitigation preserve? Has the WCB, which provided the taxpayer funds to purchase these easements, been contacted about the use of these lands as part of TRC’s Centennial mitigation preserve? Are these areas simply being included to augment the number of acres used for mitigation, possibly to increase, on paper, the mitigation to disturbed area ratio? Are these lands included to simply make the lands available for mitigation look more robust than they actually are? For a picture of what the mitigation preserve actually looks like if more accurately depicted please refer to Map 2, in which areas already covered by conservation easements are depicted in red.

Furthermore, we continue to have serious concerns about the ability of TRC to mitigate for the loss of grassland habitats on Centennial. The rich nature of the grassland habitats on Centennial have been detailed in the study by Vollmar Consulting from 2003-2004 (See Attachment2_VollmarReport.pdf). In this report, Vollmar details the native grassland and wildflower habitats as the product of a variety of environmental factors endemic to Centennial. These factors include geologic origin, soil texture, topographic position in the landscape and climate. Map 3 details the distribution of grassland habitats in the mitigation preserve. This map makes it entirely clear that a large proportion of the grassland habitats proposed as mitigation, approximately 9,000 acres (40% of the grassland total), is located within land covered by existing easements. The addition of the eastern portion of Area 7 in the FEIR increases the amount of grassland mitigation acreage by 7,877 acres. Given that the quality of grassland habitats within Centennial is related to a combination of environmental factors, we question the comparability of these habitats with those to the Area 6 and the eastern portion of Area 7. Has TRC provided a scientifically-defensible analysis of grassland habitats in Area 6 and the eastern area of 7 with those on Centennial?

From my own observations, having done botanical research on Tejon Ranch for more than four years as part of my dissertation, I can conclusively say that environmental factors and habitats change quite dramatically as one travels east along the foothills of the Tehachapi Mountains. Habitats become drier and more influenced by Mojave Desert vegetation as one travels east from Centennial. A striking example of this is the absence of Joshua tree (*Yucca brevifolia*) on Centennial and its prevalence farther to the east. The composition of perennial grasslands also changes as one travels from west to east. For example, grassland habitats dominated by nodding needlegrass (*Stipa cernua*) in the foothills of the western Tehachapi Mountains give rise to grasslands dominated by desert needle grass (*Stipa speciosa*) to the east. How can the grassland habitats in the eastern part of Mitigation Area 7 and Area 6 serve adequately as mitigation for the loss of grassland habitats on Centennial? Empirically, there are also numerous examples of plant species that are not known from east of Big Sycamore Canyon, which is roughly in line with the eastern edge of Centennial. I have hypothesized that this is related to microclimatic patterns, which result in higher annual precipitation rates to the west of this "divide." If TRC wants to use land in the eastern portion of Tejon Ranch to mitigate for the loss of habitat on Centennial they should be required to prove that these lands are equivalent using reproducible methods with the results published in peer-reviewed journals.

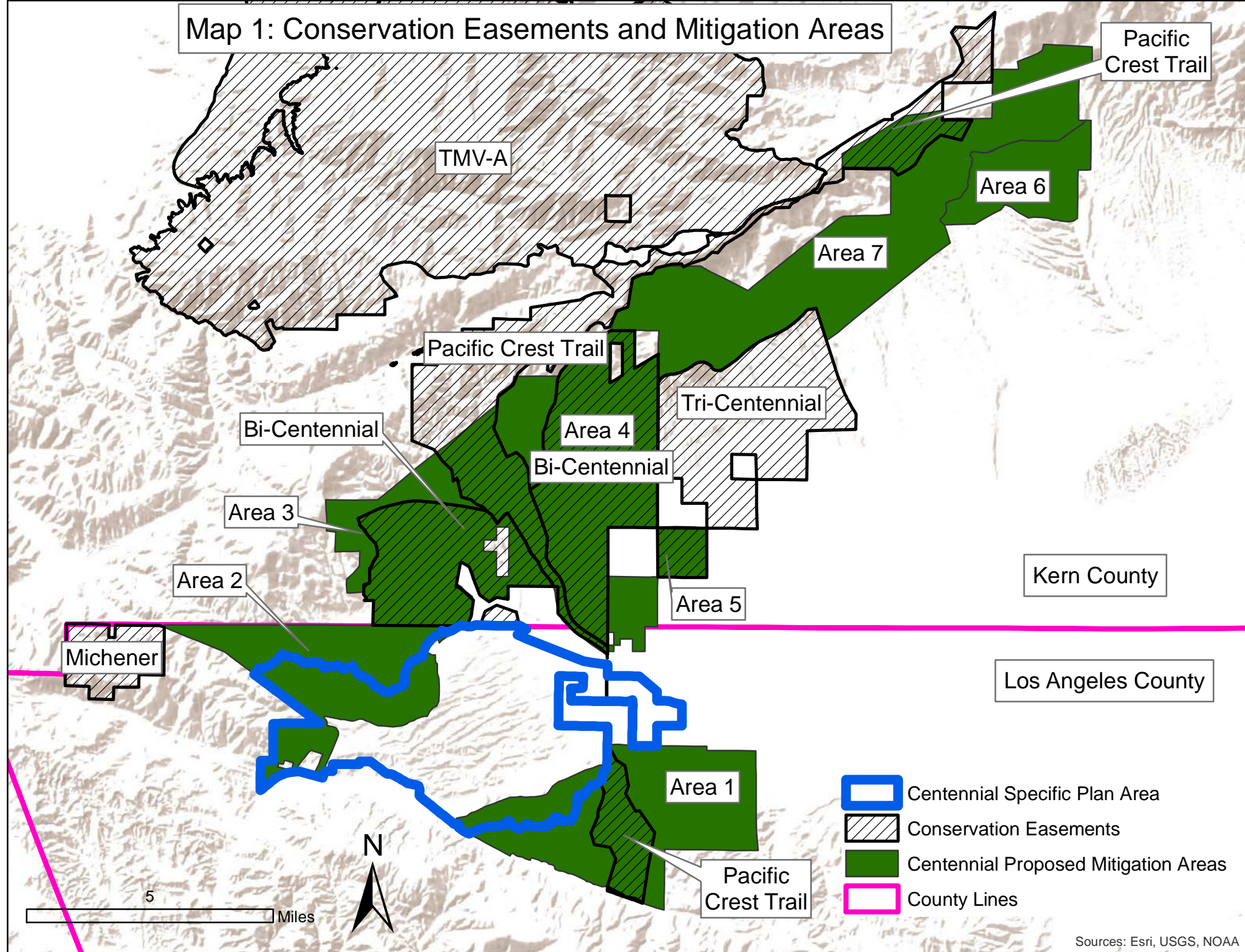
In summary, TRC has presented a mitigation proposal that includes more than 15,000 acres of land that have already been spoken for, in that they are already covered by existing conservation easements. Additionally, the use of the eastern portion of Area 7 and Area 6 to mitigate for habitat losses on Centennial is dubious and merits further study. When these eastern habitats are taken away from mitigation preserve along with the 15,772 acres of lands already covered by conservation easements does TRC have a viable mitigation preserve? Numerous scientists have detailed the unique and special nature of the habitats on Tejon Ranch. Among these special habitats, the grasslands on Centennial are exemplary, unique, and irreplaceable. Given the value of these habitats, a more creative and comprehensive mitigation preserve design is warranted. Until this is prepared by TRC, the design presented in the FEIR should be deemed inadequate.





Sincerely,



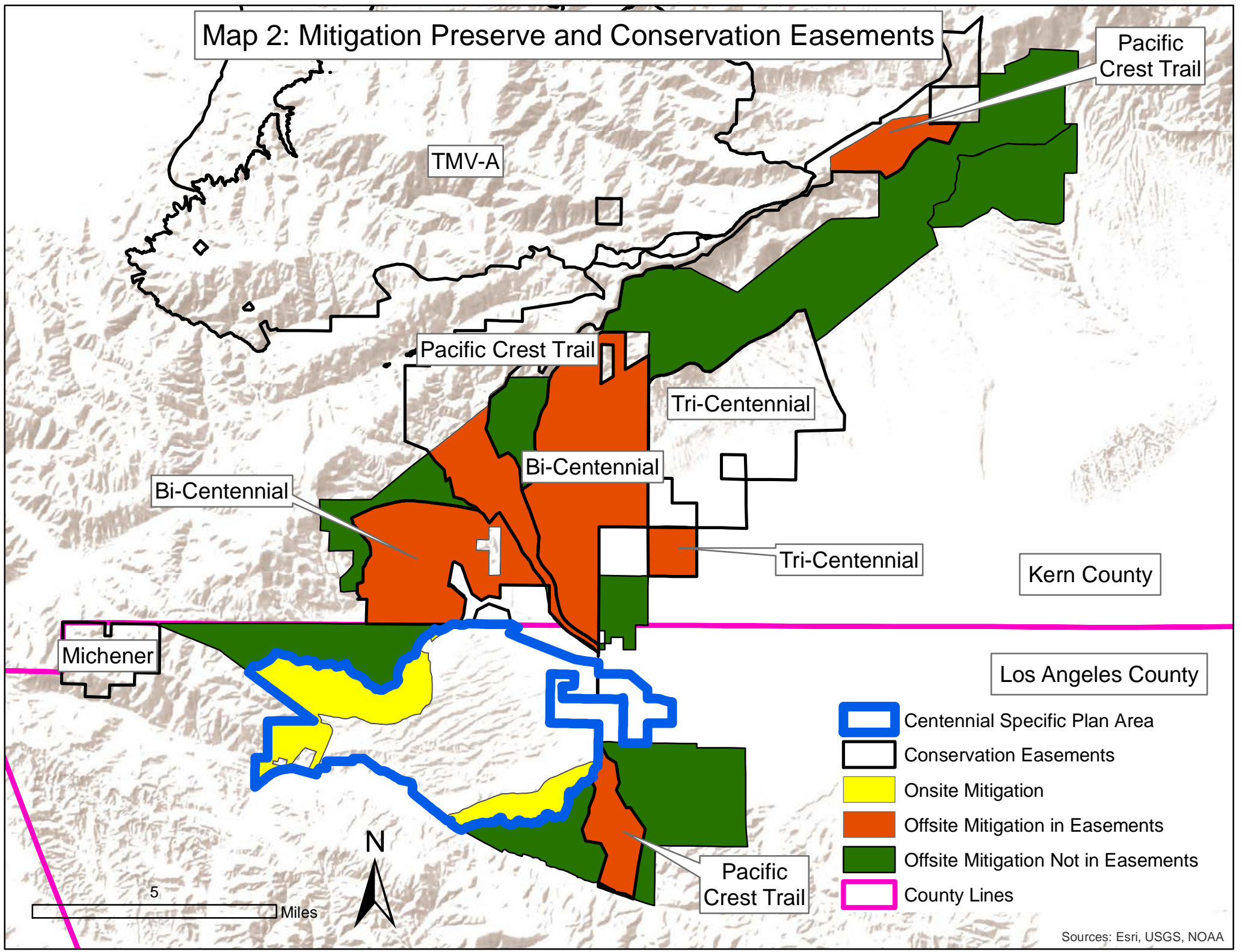
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Map 1: Conservation Easements and Mitigation Areas



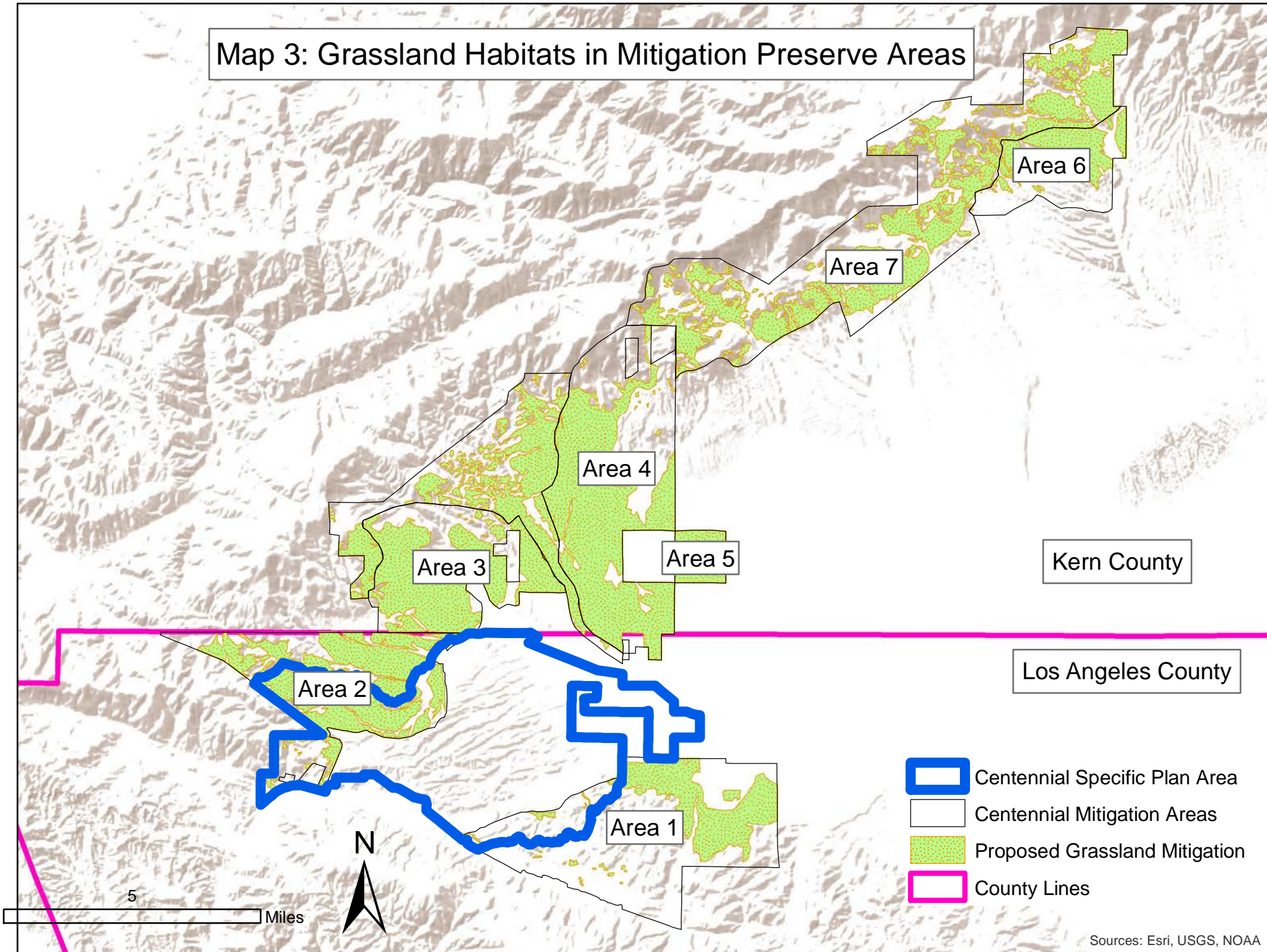
-  Centennial Specific Plan Area
-  Conservation Easements
-  Centennial Proposed Mitigation Areas
-  County Lines

Map 2: Mitigation Preserve and Conservation Easements



Sources: Esri, USGS, NOAA

Map 3: Grassland Habitats in Mitigation Preserve Areas



Kern County

Los Angeles County

- Centennial Specific Plan Area
- Centennial Mitigation Areas
- Proposed Grassland Mitigation
- County Lines

Sources: Esri, USGS, NOAA