

I address the Regional Planning Commission as a retired architect and urban planner with 45 years of large scale development experience within the United States and internationally, and as a former member of AIA, APA, ULI and USGBC. My recent experience beyond LEED award winning projects is as CEO of an environmental software firm whose primary product was a GHG forecasting and mitigation tool for land development in California.

I have very high expectations for the quality of development plan for the Centennial site, if anything at all is to be built on this fragile and irreplaceable land. California deserves to see a state of the art plan incorporating innovative features that maximize the environmental relevance and character of the site. As it stands, the Centennial Plan as of July 11, 2018 does not rise to that level of quality. I am very disappointed that the current concept could reflect badly on our elected representatives as well as our state.

I am not opposed to appropriate development on this site, but I have serious concerns about the following key issues in the TRC plan as presented on July 11.

**Market Reality and Land Uses:** Simply having a plan and an EIR does not create market feasibility—this has been proven numerous times in the development industry. Has the Tejon Ranch Company provided an analysis of market viability for the proposed uses in this location? Is this even the right concept for the site? What about the location's value for scientific study of biodiversity and ecosystem services, recreation, environmental testing of native and other plants, on-site green power generation, etc. I.e., activities that push the envelope of knowledge about how to develop in these fraught locations?

A developer doing due diligence for this project could reasonably conclude that there is simply too much up-front and mitigation cost involved given the size of the project and its remote location. Has the RPC presented developer pro-formas that state the financial viability of Centennial given the high levels of mitigation required? And, importantly, who is the developer who will actually be responsible for doing the land and vertical development?

**GHG:** The MTCO<sub>2</sub>/SP reading is at wild variation from other California mixed-use projects. The major flaw in the conclusion about very low GHG generation at Centennial is the application of the Cap and Trade Program. According to my conversation with CARB, this project cannot be a "participating entity" under paragraph 95811 of the Cap and Trade legislation, and therefore the massive deduction of GHG should not be taken as Psomas states. The entities actually allowed to participate in Cap and Trade are all prime generators of GHG emissions such as electrical generation stations and cement plants. Each participating entity must register under the CITSS (Compliance Instrument Tracking System Service). Has this been done yet by the applicant?

Compounding this is a combination of extremely optimistic assumptions about EV's and travel patterns, which lead in the Psomas report to the conclusion that negative GHG emissions could be generated! This may be the result of arithmetically adding up mitigation benefits, when in fact, the overall result of such mitigations is usually a resultant of several factors acting together.

Lacking Cap and Trade, the only other way the GHG due to travel and energy could be so low would be for nearly every vehicle mile travelled to be within the Centennial site, for every building to be built to a LEED-Gold standard or better, and a number of other energy-saving provisions built in.

The term "Net Zero" is being profoundly misused, leading to the misapprehension that no water and no energy will be used due to a multitude of mitigations. What are the assumptions for vehicle miles travelled that would justify the GHG conclusions for travel? May we see the resulting calculations for these mitigation-related GHG reductions?

**Enforceability:** Commissioner Smith raises perhaps the most relevant point: enforceability of the plan upon incorporation or annexation. Mitigation monitoring as a practice is insufficient (and can be ineffective over time) to ensure that standards are met as the project is built out. The Development Agreement (DA) would have to be enforced upon incorporation (annexation seems unlikely) by a newly-formed City of Centennial. Does Los Angeles County have the leverage and political will in such a case to demand high consistent standards from the developer? I would like to see details about how this transition of approval power can be implemented to enforce the terms of the DA over the life of the project. All the stated goals of the plan are subject to compromise over time, so enforcement is crucial to success.

The current plan relies on a long list of mitigations, credits, offsets and other devices to somehow make it a quality plan. The quality of a plan, however, is not measured by how many tons of CO2 are offset, and in how many dozens of mitigation measures have to be lined up to justify the concept. A good plan should pre-mitigate potential problems by the character of the plan--this one does not do that.

Based on the factors noted above, I recommend that RPC require TRC to go back to the drawing board and create a plan that sets a world-class standard in every aspect of its concept including its built form. This could take far less time as a win-win instead of a prolonged battle over the EIR. There is work that needs to be done by the RPC on these points. I'm looking carefully at how the RPC and the Supervisors handle this project from here on out.

Sincerely,

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